



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: December 28, 2006
RE: Forest River, Inc., College Avenue Complex / 039-23200-00011
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Indianapolis, Indiana 46204-2251
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Thomas W. Easterly
Commissioner

December 28, 2006

Mr. Bill Conway
Forest River, Inc., College Avenue Complex
P.O. Box 3030
Elkhart, Indiana 46315

Re: 039-23200-00011
First Significant Permit Modification to
Part 70 No.: T 039-17998-00011

Dear Mr. Conway:

Forest River, Inc. was issued a permit on June 29, 2005 for a stationary custom recreational vehicle manufacturing plant. A letter requesting changes to this permit was received on June 8, 2006. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the source (Forest River, Inc., College Avenue Complex) taking limits on the amount of hazardous air pollutants (HAPs) emitted by the source such that the source would be a minor source of HAPs under Section 112 of the Clean Air Act. The Permittee wishes to take these limits in advance of the compliance deadlines for 40 CFR 63, Subpart PPPP (April 19, 2007), 40 CFR 63, Subpart MMMM (January 2, 2007), and 40 CFR 63, Subpart DDDDD (September 13, 2007). Conditions limiting HAP usage, and requiring compliance determination, recordkeeping and reporting for the HAP limits have been added to the permit.

IDEM, OAQ has also revised and updated conditions in the permit. Section B – General Conditions and Section C - Source Operation Conditions have been revised, deleted or added to the permit to clarify the permit and condition terms. Rule cites have been updated. When conditions are added or deleted, the other conditions are renumbered accordingly and the Table of Contents modified to reflect these changes. These changes are explained in the Technical Support Document for this Significant Permit Revision. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/ST

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karciewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Forest River, Inc., College Avenue Complex
2780, 2790, and 3010 College Avenue
and 1803 and 2367 Century Drive
Goshen, Indiana 46526**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17998-00011	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 29, 2005 Expiration Date: June 29, 2010

1st Administrative Amendment No.: 039-21534-00011, issued September 23, 2005

1 st Significant Permit Modification No.: 039-23200-00011	Affected Pages: Entire Permit
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 28, 2006 Expiration Date: June 29, 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, A.3, and A.4 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary custom recreational vehicle manufacturing plant that also converts stock vans to conversion vans.

Responsible Official:	President and CEO
Source Address:	2780, 2790, and 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana, 46526
Mailing Address:	P.O. Box 3030, Elkhart, Indiana 46515
General Source Phone Number:	(574) 534-6913
SIC Code:	3716, 3792
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour Ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This recreational vehicle manufacturing company consists of three (3) plants:

- (a) Starcraft Bus and Mobility (Plant 5), including the Mini line (FE-9), the Freightliner line (FE-5), the Bus line (FE-6) and the Sprinter line (FE-7) is located at 2367 Century Drive, Goshen, Indiana; and
- (b) Surveyor (Plant 37), including the Surveyor line (FE-3), the Grand Surveyor line (FE-4) and the M.B. Cruiser line (FE-8) is located at 2367 Century Drive, Goshen, Indiana; and
- (c) Complex/1803, including the Salem/Wildwood line (FE-14), the Sierra/Sandpiper line (FE-13) and the Vanguard line (FE-16) is located at 3010 College Avenue, and 1803 Century Avenue, Goshen, Indiana.

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, share products, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Ten (10) production assembly lines, each applying adhesives to metal, plastic and wood, consisting of :
 - (1) One (1) Surveyor Model Assembly line, identified as FE-3, modified in 2003, with a maximum capacity of ten (10) units per day and 4.12 gallons of coatings per hour.

- (2) One (1) Grand Surveyor Model Assembly line, identified as FE-4, modified in 2003, with a maximum capacity of four (4) units per day and 1.81 gallons of coatings per hour.
- (3) One (1) Freightliner Model Assembly line, identified as FE-5, modified in 2003, with a maximum capacity of two (2) units per week and 0.69 gallons of coatings per hour.
- (4) One (1) Bus Model Assembly line, identified as FE-6, modified in 2003, with a maximum capacity of twelve (12) units per week and 5.14 gallons of coatings per hour.
- (5) One (1) Sprinter Model Assembly line, identified as FE-7, modified in 2003, with a maximum capacity of six (6) units per week and 0.98 gallons of coatings per hour.
- (6) One (1) M.B. Cruiser Model Assembly line, identified as FE-8, modified in 2003, with a maximum capacity of two (2) units per week and 0.29 gallons of coatings per hour.
- (7) One (1) Mini Model Assembly line, identified as FE-9, modified in 2003, with a maximum capacity of five (5) units per week and 0.43 gallons of coatings per hour.
- (8) One (1) Sierra/Sandpiper Model Assembly line, identified as FE-13, constructed in 1997, with a maximum capacity of twenty-two (22) units per day and 0.75 gallons of coatings per hour.
- (9) One (1) Salem/Wildwood Model Assembly line, identified as FE-14, constructed in 1997, with a maximum capacity of thirty (30) units per day and 0.75 gallons of coatings per hour.
- (10) One (1) Vanguard Model Assembly line, identified as FE-16, constructed in 2003, with a maximum capacity of twelve (12) units per day and 7.05 gallons of coatings per hour.

On all production assembly lines, the coatings are applied directly to substrate by tube, extrusion, with a tool or other manual application, with emissions vented inside the building and then to general ventilation.

- (b) Three (3) woodshops, consisting of:
 - (1) Two (2) woodshops associated with production lines FE-3 through FE-9 equipped with various types of saws, routers, and sanders, identified as the "original woodshop" (FE-1) and the "surveyor woodshop"(FE-2), with the original woodshop constructed in 1975 and the surveyor woodshop constructed in 2003, with a total maximum capacity of 1900 pounds of wood per hour, with each woodshop using two baghouses for particulate control, with emissions exhausting indoors and then to general ventilation.
 - (2) One (1) woodshop associated with production lines FE-13 through FE-16, with cutting of pre-finished parts and assembly, identified as "Cabinet Shop Woodworking Operation," constructed in 1997, with a total maximum capacity of 600 pounds of wood per hour, using a baghouse for particulate control, with emissions exhausting indoors and then to general ventilation.
- (c) One (1) Parts/Service Department, identified as FE-15, constructed in 1997, applying coatings to metal and plastic, with a maximum capacity of repairing three (3) units per day, equipped with an airless spray system and a HVLP spray system.

- (d) One (1) surface coating booth (North Primer Booth), identified as EU-41, constructed prior to 1997 and modified in 2001 and 2005, with a maximum capacity of coating steel parts for seven (7) buses per hour, equipped with HVLP and air atomized spray guns, using dry filters to control PM overspray, with emissions exhausting to stacks SV-10, SV-11, SV-37 and SV-38.
- (e) Two (2) surface coating booths (Touch Up) used for repairs, touch-up, and other operations, identified as EU-49R and EU-50R, constructed prior to 1997 and modified in 2004 and 2005, applying coatings to metal and plastic, equipped with High Velocity Low Pressure (HVLP) and air atomized spray systems, using dry filters to control PM overspray. Emissions from EU-49R exhaust to stacks SV-18 and SV-19 and emissions from EU-50R exhaust to stacks SV-20 and SV-21.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Three (3) natural gas fired boilers, identified as B-30, B-31 and B-32, constructed between 1984 and 1999, with a maximum heat input capacity of 4.2 million British thermal units per hour (MMBtu/hr) each, exhausting at three stacks identified as 30, 31, and 32. [326 IAC 6-2-4]
 - (2) Two (2) natural gas fired boilers, identified as B-33 and B-34, constructed between 1984 and 1999, with a maximum heat input capacity of 6.278 million British thermal units per hour (MMBtu/hr) each, exhausting at two stacks identified as 33 and 34. [326 IAC 6-2-4]
- (b) Paved and unpaved roads with public access. [326 IAC 6-4]
- (c) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to three-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four-thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations, consisting of: downdraft sanding tables, vacuum system, research and development bagfilter, barrel top bagfilter and woodworking operations separate from the Woodworking shop. [326 IAC 6-3-2]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment, consisting of three (3) welding areas, identified as FE-10, FE-11 and FE-12. [326 IAC 6-3-2] [40 CFR 52, Subpart P].

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T039-17998-00011, 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, including any permit shield provided in 326 IAC 2-7-15, 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 [326 IAC 2-7-7]

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 [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [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.
- (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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM: Main Office
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Northern Regional Office
Telephone Number: 1-800-753-5519 or
Telephone Number: (574) 245-4870
Facsimile Number: (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit

under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to T039-17998-00011, and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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 nine (9) months 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 2-7 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuels switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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 2-7-5(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 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 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.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 the "responsible official" 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 [326 IAC 2-7-6(1)]

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

-
- (a) 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 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 and be accurate within plus or minus two percent (2%)

of full scale reading.

- (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 [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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100 North Senate Avenue
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within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 27-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7(b)] [326 IAC 2-3]

- (a) Records of all require 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 with 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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.11] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. An deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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- (c) 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.
- (d) Unless otherwise specified in this permit, all records 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.

- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(15)]:

- (a) Ten (10) production assembly lines, each applying adhesives to metal, plastic and wood, consisting of :
- (1) One (1) Surveyor Model Assembly line, identified as FE-3, modified in 2003, with a maximum capacity of ten (10) units per day and 4.12 gallons of coatings per hour.
 - (2) One (1) Grand Surveyor Model Assembly line, identified as FE-4, modified in 2003, with a maximum capacity of four (4) units per day and 1.81 gallons of coatings per hour.
 - (3) One (1) Freightliner Model Assembly line, identified as FE-5, modified in 2003, with a maximum capacity of two (2) units per week and 0.69 gallons of coatings per hour.
 - (4) One (1) Bus Model Assembly line, identified as FE-6, modified in 2003, with a maximum capacity of twelve (12) units per week and 5.14 gallons of coatings per hour.
 - (5) One (1) Sprinter Model Assembly line, identified as FE-7, modified in 2003, with a maximum capacity of six (6) units per week and 0.98 gallons of coatings per hour.
 - (6) One (1) M.B. Cruiser Model Assembly line, identified as FE-8, modified in 2003, with a maximum capacity of two (2) units per week and 0.29 gallons of coatings per hour.
 - (7) One (1) Mini Model Assembly line, identified as FE-9, modified in 2003, with a maximum capacity of five (5) units per week and 0.43 gallons of coatings per hour.
 - (8) One (1) Sierra/Sandpiper Model Assembly line, identified as FE-13, constructed in 1997, with a maximum capacity of twenty-two (22) units per day and 0.75 gallons of coatings per hour.
 - (9) One (1) Salem/Wildwood Model Assembly line, identified as FE-14, constructed in 1997, with a maximum capacity of thirty (30) units per day and 0.75 gallons of coatings per hour.
 - (10) One (1) Vanguard Model Assembly line, identified as FE-16, constructed in 2003, with a maximum capacity of twelve (12) units per day and 7.05 gallons of coatings per hour.
- On all production assembly lines, the coatings are applied directly to substrate by tube, extrusion, with a tool or other manual application, with emissions vented inside the building and then to general ventilation.
- (c) One (1) Parts/Service Department, identified as FE-15, constructed in 1997, applying coatings to metal and plastic, with a maximum capacity of repairing three (3) units per day, equipped with an airless spray system and a HVLP spray system.
- (d) One (1) surface coating booth (North Primer Booth), identified as EU-41, constructed prior to 1997 and modified in 2001 and 2005, with a maximum capacity of coating steel parts for seven (7) buses per hour, equipped with HVLP and air atomized spray guns, using dry filters to control PM overspray, with emissions exhausting to stacks SV-10, SV-11, SV-37 and SV-38.

Emission Unit Description [326 IAC 2-7-5(15)] (Continued):

- (e) Two (2) surface coating booths (Touch Up) used for repairs, touch-up, and other operations, identified as EU-49R and EU-50R, constructed prior to 1997 and modified in 2004 and 2005, applying coatings to metal and plastic, equipped with High Velocity Low Pressure (HVLP) and air atomized spray systems, using dry filters to control PM overspray. Emissions from EU-49R exhaust to stacks SV-18 and SV-19 and emissions from EU-50R exhaust to stacks SV-20 and SV-21.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 HAP Minor Limit [40 CFR 63, Subpart PPPP] [40 CFR 63, Subpart MMMM] [40 CFR 63, Subpart DDDDD]

In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP as follows:

- (a) The total usage of a single HAP in the production assembly lines and surface coating operations (identified in this permit as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R) including cleanup solvents, minus the HAP in any coating material or solvent shipped offsite, shall be limited to less than nine and six-tenths (9.6) tons of hexane and less than nine and nine-tenths (9.9) tons of any other single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month. This condition will limit source-wide emissions of any single HAP to less than ten (10) tons per year.
- (b) The total usage of any combination of HAPs in the production assembly lines and surface coating operations (identified in this permit as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R) including cleanup solvents minus the HAP in any coating material or solvent shipped off-site, shall be limited to less than twenty-four and six-tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this condition will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Therefore, the requirements of 40 CFR 63, Subpart PPPP, 40 CFR 63, Subpart MMMM, and 40 CFR 63, Subpart DDDDD do not apply.

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to CP 039-2490-00011, issued on April 21, 1994, the combined input of VOC at EU-49R and EU-50R, including coatings, dilution solvents, and cleaning solvents shall be less than 134 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (PSD) not applicable to the emission units originally constructed under CP 039-2790-00011, and currently identified as EU-49R and EU-50R.
- (b) Pursuant to Significant Permit Modification 039-11338-00011, issued April 20, 2000, the combined input of VOC (including adhesives, coatings, dilution solvents and cleaning solvents) to the production assembly lines and surface coating operations FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, and EU-50R shall be limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications performed under Significant Source Modification 039-12642-00011.

D.1.3 Volatile Organic Compounds [326 IAC 8-2-9 (Miscellaneous Metal Coating)]

- (a) The volume weighted average volatile organic compound (VOC) content of coating applied to metal parts from the production assembly lines FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15 and FE-16, the North Primer Booth (EU-41), and the Touch Up booths EU-49R and EU-50R shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.
- (b) Compliance with the VOC content limit in condition D.1.3(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The volume weighted average of the volatile organic compound (VOC) content of coatings used shall be determined using the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

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

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6 (BACT)]

Pursuant to Pursuant to CP 039-2790-00011, issued on April 21, 1994, the BACT determined for booths EU-49R and EU-50R when spraying plastic surfaces shall be the use of High Volume Low Pressure spray system, and airless spray system.

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray surface coating operations (FE-15, EU-41, EU-49R and EU-50R) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)[326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (a) Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 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 and HAP 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.
- (b) The Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and cleanup shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C - Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).

(c) Compliance with the VOC and HAP usage limitations contained in conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP shipped off-site, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.

(1) For the VOC limits in Condition D.1.2, the VOC emissions for a month can be arrived at using the following equation:

$$\text{VOC emitted} = \text{VOC}_U - \text{VOC}_R$$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

(2) For the HAP limits in Condition D.1.1, the HAP emissions for a month can be arrived at using the following equation:

$$\text{HAP emitted} = \text{HAP}_U - \text{HAP}_R$$

Where

HAP_U = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

HAP_R = The total amount of HAP, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-10, SV-11, SV-18, SV-19, SV-20, SV-21, SV-36, SV-37 and SV-38) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the HAP content of all of the materials delivered to the operators at FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material, adhesive, caulking compound, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The amount and HAP content of each coating material and solvent shipped off-site each month. Records shall include weight of coating material and solvent in each shipment and HAP content test results, as necessary to verify the type and amount recycled.
 - (3) The total HAP usage for each month.
 - (4) The weight of HAP usage, minus the HAP shipped off-site, for each compliance period.
 - (5) The weight of single HAPs and total HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall maintain records of the VOC content of the materials delivered to the operators at emission units FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, EU-41, EU-49R and EU-50R in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.2(a) and D.1.2(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material, adhesive, caulking compound, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The amount and VOC content of each coating material and solvent shipped off-site each month. Records shall include weight of coating material and solvent in each shipment and VOC content test results, as necessary to verify the type and amount recycled.
 - (3) The total VOC usage for each month.
 - (4) The weight of VOC usage, minus the VOC shipped off-site, for each compliance period.
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.3(a), the Permittee shall maintain records of the volume weighted average VOC content of the materials delivered to the operators at booths EU-41, EU-49R and EU-50R and the operators at production lines FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15 and FE-16 in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC content of each coating material and dilution solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The volume weighted VOC content of the coatings used for each month;
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(15)]:

- (b) Three (3) woodshops, consisting of:
- (1) Two (2) woodshops associated with production lines FE-3 through FE-9 equipped with various types of saws, routers, and sanders, identified as the "original woodshop" (FE-1) and the "surveyor woodshop" (FE-2), with the original woodshop constructed in 1975 and the surveyor woodshop constructed in 2003, each with a total maximum capacity of 950 pounds of wood per hour, with each woodshop using two baghouses for particulate control, with emissions exhausting indoors and then to general ventilation.
 - (2) One (1) woodshop associated with production lines FE-13 through FE-16, with cutting of pre-finished parts and assembly, identified as "Cabinet Shop Woodworking Operation", constructed in 1997, with a total maximum capacity of 600 pounds of wood per hour, using a baghouse for particulate control, with emissions exhausting indoors and then to general ventilation.

Insignificant Activities

- (c) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to three-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four-thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations, consisting of: downdraft sanding tables, vacuum system, research and development bagfilter, barrel top bagfilter and woodworking operations separate from the Woodworking shop. [326 IAC 6-3-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to T039-6130-00011, issued on June 17, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operations identified as FE-1 and FE-2 shall not exceed 3.96 pounds per hour when operating at a combined process weight rate of 1,900 pounds per hour.
- (b) Pursuant to MSOP 039-10468-00469, issued April 14, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operations identified as "Cabinet Shop Woodworking Operation" shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the insignificant grinding and machining operations shall not exceed E as shown in the following equation:

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

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Particulate Control [326 IAC 2-7-6(b)]

- (a) Pursuant to Second Significant Permit Modification 039-17379-00011, issued May 30, 2003, and in order to comply with Condition D.2.1, the baghouses and fabric/bag filters for particulate control shall be in operation and control emissions from the woodworking operations and insignificant grinding and machining operations at all times that the woodworking operations and insignificant grinding and machining operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operations and insignificant grinding and machining operations exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. Visible emission notations are optional when venting to the indoors. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations and insignificant grinding and machining operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the

event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations and insignificant grinding and machining operations stack exhausts required under Condition D.2.4.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
- (1) Three (3) natural gas fired boilers, identified as B-30, B-31 and B-32, constructed between 1984 and 1999, with a maximum heat input capacity of 4.2 million British thermal units per hour (MMBtu/hr) each, exhausting at three stacks identified as 30, 31, and 32. [326 IAC 6-2-4]
 - (2) Two (2) natural gas fired boilers, identified as B-33 and B-34, constructed between 1984 and 1999, with a maximum heat input capacity of 6.278 million British thermal units per hour (MMBtu/hr) each, exhausting at two stacks identified as 33 and 34. [326 IAC 6-2-4]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the three (3) 4.2 MMBtu/hr natural gas-fired boilers and the two (2) 6.278 MMBtu/hr natural gas-fired boilers shall be limited to 0.47 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity in million Btu/hr (MMBtu/hr) heat input.

SECTION D.4

FACILITY OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(15)] Insignificant Activities:

- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment, consisting of three (3) welding areas, identified as FE-10, FE-11 and FE-12. [326 IAC 6-3-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the insignificant welding operations (FE-10, FE-11 and FE-12) shall not exceed E as shown in the following equation:

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:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011
Facility: The production assembly lines and surface coating operations identified as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, EU-41, EU-49R, EU-50R
Parameter: VOC: Total usage, including adhesives, coatings, additives, and solvents.
Limit: Less than 250 tons per twelve consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Forest River, Inc., College Avenue Complex
 Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
 Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
 Part 70 Permit No.: T039-17998-00011
 Facility: The production assembly lines and surface coating operations identified as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R
 Parameter: Single HAP: Total usage, including adhesives, coatings, additives, and solvents.
 Limit: Less than nine and six-tenths (9.6) tons of hexane and less than nine and nine-tenths (9.9) tons of any other single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011
Facility: The production assembly lines and surface coating operations identified as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R
Parameter: Combination of HAPs: Total usage, including adhesives, coatings, additives, and solvents.
Limit: Less than twenty-four and six-tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011
Facility: Emission Units EU-49R and EU-50R
Parameter: VOC: Total usage, including solvents, additives and coatings
Limit: Less than 134 tons per twelve consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Forest River, Inc., College Avenue Complex
Source Address: 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
Mailing Address: P.O. Box 3030, Elkhart, Indiana 46515
Part 70 Permit No.: T039-17998-00011

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Description and Location

Source Name: Forest River, Inc., College Avenue Complex
Source Location: 2780, 2790, and 3010 College Avenue, and 1803 and 2367
Century Drive, Goshen, Indiana 46526
County: Elkhart
SIC Code: 3716, 3792
Operation Permit No.: T039-17998-00011
Permit Issuance Date: June 29, 2005
Permit Modification No.: 039-23200-00011
Permit Reviewer: ERG/ST

The Office of Air Quality (OAQ) has reviewed a modification application from Forest River, Inc., College Avenue Complex relating to the operation of a stationary custom recreational vehicle manufacturing plant that also converts stock vans to conversion vans.

Explanation of Modification

In a letter received June 8, 2006, Forest River, Inc. requested to take limits on the amount of hazardous air pollutants (HAPs) emitted by the source such that the source would be a minor source of HAPs under Section 112 of the Clean Air Act. The Permittee wishes to take these limits in advance of the compliance deadlines for 40 CFR 63, Subpart PPPP (April 19, 2007), 40 CFR 63, Subpart MMMM (January 2, 2007), and 40 CFR 63, Subpart DDDDD (September 13, 2007). Conditions D.1.1, D.1.2, D.1.3, D.1.14, D.1.15, and D.1.16 from T039-17998-00011, issued on June 29, 2005, would be removed in this Significant Permit Modification. New conditions limiting HAP usage, and requiring compliance determination, recordkeeping and reporting for the HAP limits have been added to the permit.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) because: it involves a significant change to recordkeeping and reporting requirements in the Part 70 permit (326 IAC 2-7-12(b)(1)(B)), and it establishes a Part 70 permit condition for which there is no corresponding underlying applicable requirement that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject (326 IAC 2-7-12(b)(1)(D)).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment

Pollutant	Status
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board approved a permanent rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) 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.
- (b) 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 Emission Offset, 326 IAC 2-3.
- (c) 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.

Federal Rule Applicability

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in the permit for the five (5) natural gas fired boilers. because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and this source is taking the HAP limit prior to the September 13, 2007 compliance date for existing sources subject to this rule.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit for the surface coating booths applying organic coatings containing HAPs to metal parts and products because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and this source is taking the HAP limit prior to the January 2, 2007 compliance date for existing sources subject to 40 CFR 63, Subpart MMMM.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants - Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) are not included in the permit for the surface coating booths applying organic coatings containing HAPs to fiberglass parts because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and this source is taking the HAP limit prior to the April 19, 2007 compliance date for existing sources subject to 40 CFR 63, Subpart PPPP.

Recommendation

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

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

An application for the purposes of this review was received on June 8, 2006.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 039-17998-00011. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. Conditions D.1.1, D.1.2, D.1.3, D.1.14, D.1.15, and D.1.16 from T039-17998-00011, issued on June 29, 2005, are removed in this Significant Permit Modification as follows:

~~D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]~~

~~(a) The provisions of 40 CFR Part 63, Subpart A—General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2004.~~

~~(b) The provisions of 40 CFR Part 63, Subpart A—General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2004.~~

~~(c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.~~

~~D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]~~

~~(a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.~~

~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.14, Notification Requirements.~~

~~(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).~~

~~(1) All coating operations as defined in 40 CFR 63.3981;~~

~~(2) All storage containers and mixing vessels in which coatings, thinners and/or other~~

additives, and cleaning materials are stored or mixed;

(3) ~~All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and~~

(4) ~~All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.~~

(d) ~~Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3981, and are applicable to the affected source.~~

~~D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP]~~

~~Compliance with the emissions limitations specified in 40 CFR 63, Subpart Mmmm shall constitute compliance with the requirements of 40 CFR 63, Subpart PPPP for the surface coating operations at this source that apply surface coatings to plastic parts.~~

~~D.1.14 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products – Notification Requirements [40 CFR 63.3910]~~

(a) ~~General. The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).~~

(b) ~~Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for an existing affected source no later than January 2, 2005. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.~~

(c) ~~Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).~~

~~D.1.15 Notification Requirements – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products [40 CFR 63.4510]~~

~~Initial notification. The Permittee shall submit the initial notification no later than April 19, 2005. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee shall include a statement to this effect in the initial notification and no other notifications are required under this subpart.~~

~~D.1.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.~~

(a) ~~The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart Mmmm and 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~

(b) ~~The significant permit modification application shall be submitted no later than April 2,~~

2006 and shall be submitted to:

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

2. Conditions limiting HAP usage, and requiring compliance determination, recordkeeping and reporting for the HAP limits have been added to the permit as follows:

D.1.1 HAP Minor Limit [40 CFR 63, Subpart PPPP] [40 CFR 63, Subpart MMMM] [40 CFR 63, Subpart DDDDD]

In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP as follows:

- (a) The total usage of a single HAP in the production assembly lines and surface coating operations (identified in this permit as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R) including cleanup solvents, minus the HAP in any coating material or solvent shipped offsite, shall be limited to less than nine and six-tenths (9.6) tons of hexane and less than nine and nine-tenths (9.9) tons of any other single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month. This condition will limit source-wide emissions of any single HAP to less than ten (10) tons per year.
- (b) The total usage of any combination of HAPs in the production assembly lines and surface coating operations (identified in this permit as FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R) including cleanup solvents minus the HAP in any coating material or solvent shipped off-site, shall be limited to less than twenty-four and six-tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this condition will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Therefore, the requirements of 40 CFR 63, Subpart PPPP, 40 CFR 63, Subpart MMMM, and 40 CFR 63, Subpart DDDDD do not apply.

~~D.1.4~~ **D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)**[326 IAC 8-1-4]
[326 IAC 8-1-2(a)]

-
- (a) Compliance with the VOC and HAP content and usage limitations contained in Conditions ~~D.1.4 and D.1.5~~ **D.1.1, D.1.2, and D.1.3** 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 and HAP 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.
 - (b) The Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and cleanup solvents shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C-Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).
 - (c) Compliance with the VOC and HAP usage limitations contained in conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP

shipped off-site, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.

- (1) For the VOC limits in Condition D.1.2, the VOC emissions for a month can be arrived at using the following equation:

$$\text{VOC emitted} = \text{VOC}_U - \text{VOC}_R$$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

- (2) For the HAP limits in Condition D.1.1, the HAP emissions for a month can be arrived at using the following equation:

$$\text{HAP emitted} = \text{HAP}_U - \text{HAP}_R$$

Where

HAP_U = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

HAP_R = The total amount of HAP, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

D.1.12 D.1.9 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.4(a), the Permittee shall maintain records of the VOC content of all of the materials delivered to the operators at booths EU-49R and EU-50R in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.4(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~
- ~~(1) The amount and VOC content of each coating material, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- ~~(2) The total VOC usage for each month; and~~
- ~~(3) The weight of VOCs emitted for each compliance period.~~
- ~~(b) To document compliance with Condition D.1.4(b), the Permittee shall maintain records of the VOC content of the materials delivered to the operators at emission units FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, EU-41, EU-44, EU-46, EU-47, EU-48, EU-49R and EU-50R in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.4(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

- ~~(1) The amount and VOC content of each coating material, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(2) The total VOC usage for each month; and~~
 - ~~(3) The weight of VOCs emitted for each compliance period.~~
- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the HAP content of all of the materials delivered to the operators at FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15, FE-16, EU-41, EU-49R, EU-50R in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The amount and HAP content of each coating material, adhesive, caulking compound, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (2) The amount and HAP content of each coating material and solvent shipped off-site each month. Records shall include weight of coating material and solvent in each shipment and HAP content test results, as necessary to verify the type and amount recycled.**
 - (3) The total HAP usage for each month.**
 - (4) The weight of HAP usage, minus the HAP shipped off-site, for each compliance period.**
 - (5) The weight of single HAPs and total HAPs emitted for each compliance period.**
- (b) To document compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall maintain records of the VOC content of the materials delivered to the operators at emission units FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, EU-41, EU-49R and EU-50R in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.2(a) and D.1.2(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The amount and VOC content of each coating material, adhesive, caulking compound, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (2) The amount and VOC content of each coating material and solvent shipped off-site each month. Records shall include weight of coating material and solvent in each shipment and VOC content test results, as necessary to verify the type and amount recycled.**
 - (3) The total VOC usage for each month.**
 - (4) The weight of VOC usage, minus the VOC shipped off-site, for each compliance period.**

(5) The weight of VOCs emitted for each compliance period.

- (c) To document compliance with Condition ~~D.1.5(a)~~-**D.1.3(a)**, the Permittee shall maintain records of the volume weighted average VOC content of the materials delivered to the operators at booths EU-41, EU-49R and EU-50R and the operators at production lines FE-3, FE-4, FE-5, FE-6, FE-7, FE-8, FE-9, FE-13, FE-14, FE-15 and FE-16 in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition ~~D.1.5(a)~~-**D.1.3(a)**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and dilution solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The volume weighted VOC content of the coatings used for each month;

~~D.1.13~~ **D.1.10 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions ~~D.1.4(a)~~ and ~~D.1.4(b)~~ **D.1.1 and D.1.2** shall be submitted to the addresses 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Appropriate reporting forms for single HAP and combination HAPs have been added to the permit.

3. The address and contact information for IDEM, OAQ has been updated in the permit as follows:

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

Telephone Number: ~~317-233-5674~~ **317-233-0178**
Facsimile Number: ~~317-233-5967~~ **317-233-6865**

4. Condition D.1.3 (formerly D.1.5) has been clarified as follows:

~~D.1.5~~ **D.1.3 Volatile Organic Compounds [326 IAC 8-2-9 (Miscellaneous Metal Coating)]**

...

- (b) **Compliance with the VOC content limit in condition D.1.3(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis.** The volume weighted average of the volatile organic compound (VOC) content of coatings used shall be determined using the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

5. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation.

Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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)~~ (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 PMP does~~ **PMPs do** not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ (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 Emergency Provisions [326 IAC 2-7-16]

...

- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

6. The word “in” will be removed from the second sentence of Condition B.12 Permit Shield to be consistent with 326 IAC 2-7-15(a).

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

7. Upon further review, IDEM has decided to remove (d) concerning nonroad engines from Condition B.18 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

...

~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

8. For clarification purposes, Condition B.20 Operational Flexibility has been revised as follow:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) ...

...

(3) The changes do not result in emissions which exceed the ~~emissions allowable~~ **under limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

...

(5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **emission trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). **The Permittee shall make and makes** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) ...

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

9. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no long applicable to this source. Conditions C.1(a) and D.1.7, which contained these requirements, have been removed.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

(b) 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. ~~This condition is not federally enforceable.~~

~~D.1.7~~ **Particulate Emissions [40 CFR 52 Subpart P]**

~~Pursuant to Operating Permit T 039-6130-00011, issued June 17, 1999, MSOP 039-10468-00469, issued April 14, 1999 and 40 CFR 52 Subpart P, the particulate emissions from the spray surface coating operations (FE-15, EU-41, EU-49R and EU-50R) shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

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

~~D.1.8~~ **D.1.5 Particulate [326 IAC 6-3-2(d)]**

~~Pursuant to Operating Permit T 039-6130-00011, issued June 17, 1999, MSOP 039-10468-00469, issued April 14, 1999 and 326 IAC 6-3-2(d), particulate from the spray surface coating operations (FE-15, EU-41, EU-49R and EU-50R) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

10. 326 IAC 9 was approved into the Indiana SIP on November 30, 2004, with an effective date of January 31, 2005. Therefore, 326 IAC 9-1-2 is now federally enforceable. Condition C.4 has been modified as follows:

~~C.4~~ **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

~~The Permittee shall not operate an oxidizer or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.~~

11. Upon further review, IDEM has determined to remove Condition C.6 - Operation of Equipment because the requirements in this condition have been included in Section D.

~~C.6~~ **Operation of Equipment [326 IAC 2-7-6(6)]**

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

12. IDEM realizes that the specifications in condition C.11 (formerly C.12) can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition and Condition C.12 has been revised as follows:

~~C.12~~ **C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **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 normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.**

(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.

13. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The

Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

**C.15 C.14 Compliance Response Plan – Preparation, Implementation, Records, and Reports
Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have a Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, 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 or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.~~

~~The Parametric Monitoring and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.~~

~~(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 Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or~~
- ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) 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.~~
- (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.**

~~D.1.11~~ **D.1.8** Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-10, SV-11, SV-18, SV-19, SV-20, SV-21, SV-36, SV-37 and SV-38) while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when~~ **When there is a noticeable change in overspray emission emissions, or when evidence of overspray emission emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.1.12~~ **D.1.9** Record Keeping Requirements

- ...
- (d) To document compliance with Condition ~~D.1.9 and D.1.11~~ **D.1.8**, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections, ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~

D.2.4 Visible Emissions Notations

- ...
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emission is emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

D.2.7 Record Keeping Requirements

...

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

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

14. A rule citation in Condition C.17 (formerly C.18) Recordkeeping Requirements has been corrected:

~~C.18~~ C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7(b)] [326 IAC 2-3]

...

(c)

...

(1)

...

...

(C)

...

...

(iii)

Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)~~(3)~~(iii); and

15. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.3 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of this condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

D.2.3 Particulate Control [326 IAC 2-7-6(6)]

(a) Pursuant to Second Significant Permit Modification 039-17379-00011, issued May 30, 2003, and in order to comply with Condition D.2.1, the baghouses and fabric/bag filters for particulate control shall be in operation and control emissions from the woodworking operations and insignificant grinding and machining operations at all times that the woodworking operations and insignificant grinding and machining operations are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) ~~For multi compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~ **For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~For a single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will~~ **baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.** Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Conclusion and Recommendation

This permit modification shall be subject to the conditions of the attached Significant Permit Modification No. 039-23200-00011.

**Appendix A: Emissions Calculations
VOC and HAP Potential Emissions - Summary**

Company Name: Forest River, Inc. College Avenue Complex
Address: 2780, 2790, and 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
FESOP: 039-23200-00011
Permit Reviewer: ERG/ST
Date: July 13, 2006

Potential to Emit - VOC and HAP (tons/year)																
Emissions Unit	Volatile Organic Compounds (Total)	Methyl Ethyl Ketone	Glycol Ethers	Xylenes	Ethyl Benzene	Toluene	Hexane	Styrene	Perchloroethylene	Methylene Chloride	Trichloroethylene	Methyl Isobutyl Ketone	Methanol	Nickel Compounds	Naphthalene	Chromium Compounds
FE-3	128	1.06	0.19	0.79	0.09	59.3	0.08	0.00	0.43	0.33	0.27	0.01	7.81	0.01	0.01	0.00
FE-4	51.2	0.43	0.08	0.32	0.04	23.7	0.03	0.00	0.17	0.13	0.11	0.01	3.13	0.01	0.00	0.00
FE-5	15.8	0.01	0.00	0.26	0.02	0.04	0.05	0.00	0.02	0.01	0.01	0.00	0.02	0.00	0.00	0.00
FE-6	111	0.02	0.00	8.03	0.11	9.97	7.37	0.00	0.65	0.41	0.34	0.00	0.00	0.00	0.00	0.07
FE-7	23.9	0.01	0.00	0.88	0.11	0.74	1.00	0.00	0.09	0.02	0.02	0.00	0.01	0.00	0.00	0.04
FE-8	5.58	0.05	0.01	0.03	0.00	2.59	0.00	0.00	0.02	0.01	0.01	0.00	0.34	0.00	0.00	0.00
FE-9	8.16	0.00	0.00	0.18	0.03	0.42	0.30	0.00	0.23	0.17	0.14	0.01	0.00	0.00	0.00	0.00
FE-13	14.3	0.62	0.00	1.40	0.67	0.45	0.31	0.00	0.00	0.00	0.99	0.62	0.03	0.00	0.00	0.00
FE-14	19.6	0.85	0.00	2.01	0.92	0.62	0.41	0.02	0.00	0.00	1.35	0.01	0.06	0.00	0.00	0.00
FE-15	2.8	0.12	0.00	0.59	0.17	0.04	0.31	0.40	0.00	0.00	0.34	0.01	0.00	0.00	0.00	0.00
FE-16	29.9	1.15	0.00	2.94	1.22	0.83	0.55	0.00	0.72	0.54	0.45	0.01	0.00	0.00	0.00	0.00
EU-41	21.3	0.00	2.42	3.41	0.29	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals	432	4.32	2.70	20.8	3.67	99.1	10.4	0.42	2.33	1.62	4.03	0.68	11.4	0.02	0.014	0.11

All figures as reported by source in permit renewal application for Title V Operating Permit 039-17998-00011, issued on June 29, 2005.

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

Company Name: Forest River, Inc. College Avenue Complex
Address: 2780, 2790, and 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
FESOP: 039-23200-00011
Reviewer: ERG/ST
Date: July 13, 2006

Natural Gas-Fired Boilers and Space Heaters			
Emission Units	Number	Heat Input Capacity (MMBtu/hour)	Max. Potential Throughput (MMCF/year)
B-30, B-31 and B-32	3	4.20	108
B-33 and B-34	2	6.28	108
Space Heaters	56	0.20	96
Space Heater	1	0.15	1
Space Heater	1	0.10	1

Pollutant Emission Factor (lbs/ MMCF)						
PM*	PM10*	SO₂	NO_x**	CO	VOC	HAPs
1.9	7.6	0.6	100	84	5.5	1.89

Potential To Emit (tons/year)							
Emission Units	PM	PM10	SO₂	NO_x	CO	VOC	HAPs
B-30, B-31 and B-32	0.10	0.41	0.032	5.41	4.54	0.30	0.102
B-33 and B-34	0.10	0.41	0.032	5.39	4.53	0.30	0.102
Space Heaters	0.09	0.37	0.029	4.81	4.04	0.26	0.091
Space Heater	0.001	0.005	3.74E-04	0.062	0.052	0.003	1.17E-03
Space Heater	0.001	0.003	2.58E-04	0.043	0.036	0.002	8.10E-04
Totals	0.30	1.19	0.094	15.7	13.2	0.86	0.30

*PM emission factor is for filterable PM only. PM10 emission factor is for condensable and filterable PM and PM10 combined.

**Emission factors for NO_x: Uncontrolled = 100 lb/MMCF

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)

Methodology

Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x (1 MMCF/1,020 MMBtu)

PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Particulate Emissions From Woodworking Operations

Company Name: Forest River, Inc. College Avenue Complex
Address: 2780, 2790, and 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
FESOP: 039-23200-00011
Reviewer: ERG/ST
Date: July 13, 2006

Emission Unt ID	Process Weight Rate (lbs/hour)	Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (lbs/hour)	Uncontrolled PTE of PM/PM10 (tons/year)	Controlled PTE of PM/PM10 (lbs/hour)	Controlled PTE of PM/PM10 (tons/year)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Original Woodshop FE-1	950	20,000	0.0003	99%	5.14	22.5	0.05	0.23	2.49
Surveyor Woodshop FE-2	950	25,000	0.0003	99%	6.43	28.2	0.06	0.28	2.49
Cabinet Shop Woodworking	600	10,000	0.0005	99%	4.29	18.8	0.04	0.19	1.83
Insig. Grinding and Machining	200	1,000	0.003	99%	2.57	11.3	0.03	0.11	0.88
TOTAL						80.7		0.81	

Assume all PM is equal to PM10.

These woodworking operations exhaust inside the building.

Methodology

PTE of PM/PM10 Controlled (lbs/hour) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 1/7000 (lb/gr)

PTE of PM/PM10 Controlled (tons/year) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 8760 (hour/year) x 1/7000 (lb/gr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (lbs/hour) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hour) x 1/7000 (lb/gr) x 1/(1-Control Eff. (%))

PTE of PM/PM10 Uncontrolled (tons/year) = PTE of PM/PM10 Controlled (tons/year) x 1/(1-Control Eff. (%))

326 IAC 6-3-2 Allowable Emissions (lbs/hour) = 4.1 x (Process Weight Rate (lbs/hour) x 1 ton/2,000 lbs)^{0.67}

Appendix A: Emission Calculations
Particulate and HAP Emissions from Welding Operations

Company Name: Forest River, Inc. College Avenue Complex
Address: 2780, 2790, and 3010 College Avenue, and 1803 and 2367 Century Drive, Goshen, Indiana 46526
FESOP: 039-23200-00011
Reviewer: ERG/ST
Date: July 13, 2006

Emission Unit ID	Electrode Usage Rate (lbs/hr/welder)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Manganese Emission Factor (lbs Mn/1,000 lbs electrode)	PTE of PM/PM10 Uncontrolled (lbs/hour)	PTE of PM/PM10 Uncontrolled (tons/year)	PTE of Manganese Uncontrolled (tons/year)
FE-10	2	5.2	0.318	0.01	0.05	0.00
FE-11	2	5.2	0.318	0.01	0.05	0.00
FE-12	2	5.2	0.318	0.01	0.05	0.00
Totals				0.03	0.14	0.01

Assume all PM emissions are equal to PM10.

Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95).

Methodology

PTE PM/PM10/Mn (tons/year) = Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 hours/year x 1 ton/2,000 lbs