



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: April 26, 2007  
RE: Forest River, Inc./ 087-24028-00052  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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Mr. William G. Conway, Jr.  
Forest River, Inc. - Cherokee Division  
P. O. Box 3030  
Elkhart, Indiana 46515

Re: 087-24028-00052  
First Significant Permit Revision to  
MSOP No. 087-15238-00052

Dear Mr. Conway:

Forest River, Inc. - Cherokee Division was issued a Minor Source Operation Permit (MSOP) on November 20, 2002, for a stationary recreational vehicle manufacturing operation. A letter requesting changes to this permit was received on December 5, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes to the existing RV assembly area such that it operates as two (2) separate production lines (identified as RV-1 and RV-2) each consisting of five (5) processing facilities, and the addition of two (2) table saws under the existing wood working process and three (3) space heaters.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision letter to the front of the attached 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 Ms. Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. 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,

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

Attachments

ERG/SD

cc: File – LaGrange County  
U.S. EPA, Region V  
LaGrange County Health Department  
Northern Regional Office  
Air Compliance Section Inspector – Doyle Houser  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner  
Billing, Licensing, and Training Section - Dan Stamatkin



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**NEW SOURCE CONSTRUCTION PERMIT  
 and MINOR SOURCE OPERATING PERMIT  
 OFFICE OF AIR QUALITY**

**Forest River, Inc. - Cherokee Division  
 402 Lehman Avenue  
 Topeka, Indiana 46571**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: MSOP 087-15238-00052	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 20, 2002  Expiration Date: November 20, 2007

First Significant Permit Revision No.: 087-24028-00052	Affected Pages: All
Original Signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 26, 2007  Expiration Date: November 20, 2007

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a recreational vehicle manufacturing operation.

Source Address: 402 Lehman Avenue, Topeka, Indiana 46571  
Mailing Address: P. O. Box 3030 Elkhart, Indiana 46515-3030  
Phone Number: 219-533-5934  
SIC Code: 3792  
County Location: LaGrange  
County Status: Attainment or unclassifiable for all criteria pollutants  
Source Status: Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) RV assembly area (identified as RV-1) processing finished RVs, with a maximum throughput rate of 36 vehicles per day in a batch operation and consisting of the following processes:
  - (1) Metal department with a maximum usage rate of 2.01 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 2.06 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.64 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.66 gallons of cleaning solvents per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.56 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
  
- (b) One (1) RV assembly area (identified as RV-2) processing finished RVs, with a maximum throughput rate of 19 vehicles per day in a batch operation and consisting of the following processes:
  - (1) Metal department with a maximum usage rate of 1.06 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 1.08 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.34 gallons of material (adhesives, caulks, cleaners) per hour;

- (4) Cleaning process with a maximum usage rate of 0.35 gallons of cleaning solvent per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.30 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- (c) One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour and with particulate emissions controlled by a dust collector and exhausting at stack vent VBH-1; and
- (d) Six (6) natural gas fired space heaters, (identified as A1 through A6) with a total combined heat input capacity of 3.60 MMBtu per hour, with emissions exhausting through Stacks A1 through A6.

## **SECTION B GENERAL CONDITIONS**

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

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

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

### **B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5] [IC13-15-3-6(a)]**

- (a) This permit, M087-15238-00052, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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

### **B.8 Certification**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by

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

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

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or

potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M087-15238-00052 and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

**B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

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

**B.17 Transfer of Ownership or Operation [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6-1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.19 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

**C.5 Stack Height [326 IAC 1-7]**

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

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

## Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 the 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]

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

## Compliance Monitoring Requirements

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

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

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

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

## Corrective Actions and Response Steps

### C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

#### **C.12 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### **C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

C.14 General Reporting Requirements [326 IAC 2-1.1-1(1)] [326 IAC 2-6.1-5] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) RV assembly area (identified as RV-1) processing finished RVs, with a maximum throughput rate of 36 vehicles per day in a batch operation and consisting of the following processes:
- (1) Metal department with a maximum usage rate of 2.01 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 2.06 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.64 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.66 gallons of cleaning solvents per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.56 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- (b) One (1) RV assembly area (identified as RV-2) processing finished RVs, with a maximum throughput rate of 19 vehicles per day in a batch operation and consisting of the following processes:
- (1) Metal department with a maximum usage rate of 1.06 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 1.08 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.34 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.35 gallons of cleaning solvent per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.30 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal parts, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried or forced warm air dried coatings.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

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

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

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

**Compliance Determination Requirements**

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

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- (a) Compliance with the VOC content contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; or
- (b) Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by 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.

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

**D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily, and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used, less water.

- (2) The amount of coating material and solvent used on a daily basis.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The volume weighted average VOC content of the coatings used for each day.
- (4) The daily cleanup solvent usage; and
- (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (c) One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour and with particulate emissions controlled by a dust collector and exhausting at stack vent VBH-1; and

(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 2-6.1-5(a)(1)]

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

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

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

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

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

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

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

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

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In order to comply with Condition D.2.1, the dust collector for particulate control shall be in operation and control emissions from the wood working facility at all times that the wood working facility is in operation.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Forest River, Inc. - Cherokee Division
<b>Address:</b>	402 Lehman Avenue
<b>City:</b>	Topeka, Indiana 46571
<b>Phone #:</b>	(219) 533-5934
<b>MSOP #:</b>	087-15238-00052

I hereby certify that Forest River, Inc. - Cherokee Division is:  still in operation.  
 no longer in operation.

I hereby certify that Forest River, Inc. - Cherokee Division is:  in compliance with the requirements of MSOP 087-15238-00052.  
 not in compliance with the requirements of MSOP 087-15238-00052.

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

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

<b>Noncompliance:</b>



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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

**Technical Support Document (TSD) for a Significant Permit Revision  
to a Minor Source Operating Permit**

**Source Background and Description**

Source Name:	Forest River, Inc. - Cherokee Division
Source Location:	402 Lehman Avenue, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3792
Operation Permit No.:	M087-15238-00052
Issuance Date:	November 20, 2002
Significant Permit Revision No.:	SPR087-24028-00052
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a revision application from Forest River, Inc. - Cherokee Division relating to the operation of a stationary recreational vehicle manufacturing plant.

**History**

On December 5, 2006, Forest River, Inc. - Cherokee Division, submitted an application to IDEM, OAQ requesting approval to modify the existing RV assembly area such that it operates as two (2) separate production lines (identified as RV-1 and RV-2), each consisting of five (5) processing facilities, to add two (2) table saws under the existing wood working process, and to add three (3) space heaters.

IDEM, OAQ has determined to revise the current MSOP for Forest River, Inc. - Cherokee Division permit No.: 087-15238-00052, issued November 20, 2002, pursuant to 326 IAC 2-6.1-6(i) - Significant Permit Revision.

**Description of Revision**

The Permittee requested to construct and operate the following emission units at the source.

**A.2 Emissions units and Pollution Control Equipment Summary**

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

- ~~(a) One (1) RV assembly area, processing finished recreational vehicles at a maximum rate of 1.5 vehicles per hour (36 vehicles per day);~~
- (a) One (1) RV assembly area (identified as RV-1) processing finished RVs, with a maximum throughput rate of 36 vehicles per day in a batch operation and consisting of the following processes:**
  - (1) Metal department with a maximum usage rate of 2.01 gallons of coating material per hour;**
  - (2) Exterior caulk facility with a maximum usage rate of 2.06 gallons of material (caulk) per hour;**

- (3) Floors and plumbing facility with a maximum usage rate of 0.64 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.66 gallons of cleaning solvents per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.56 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- (b) One (1) RV assembly area (identified as RV-2) processing finished RVs, with a maximum throughput rate of 19 vehicles per day in a batch operation and consisting of the following processes:
- (1) Metal department with a maximum usage rate of 1.06 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 1.08 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.34 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.35 gallons of cleaning solvent per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.30 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- (b)(c) One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour and with particulate emissions controlled by a dust collector and exhausting at stack vent VBH-1; and
- (c)(d) ~~Three (3) 0.6 MMBtu/hr~~ Six (6) natural gas fired space heaters, (identified as A1, A2, and A3 through A6) with a total combined heat input capacity of 3.60 MMBtu per hour, with emissions exhausted through Stacks A1, A2, and A3 through A6.

#### Existing Approvals

The source was issued MSOP No.: M087-15238-00052 on November 20, 2002. There are no other approvals issued to the source.

#### Enforcement Issue

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision 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 December 5, 2006 with additional information received on January 23, 2007.

#### Emission Calculations

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

**Potential To Emit of Revision Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	51.6
PM10	51.6
SO <sub>2</sub>	4.64E-03
VOC	98.9
CO	0.65
NO <sub>x</sub>	0.77

HAP	Potential To Emit (tons/year)
Toluene	3.30
Hexane	4.73
Ethylbenzene	0.11
Xylene	0.36
Benzene	1.62E-05
Dichlorobenzene	9.28E-06
Formaldehyde	5.80E-04
<b>TOTAL</b>	<b>8.51</b>

**Justification for Revision**

This MSOP is being modified through a MSOP Significant Permit Revision pursuant to 326 IAC 2-6.1-6(i) because the revision involves significant changes to the permit.

After extensive evaluation and deliberation, IDEM, OAQ has concluded that certain permit conditions that are routinely appealed in MSOPs could be altered in a manner that would be less burdensome on the Permittee but would still ensure that sources can demonstrate compliance with State and Federal Regulations on a continuous basis. These changes, including the relaxation of compliance monitoring frequency are being made pursuant to 326 IAC 2-6.1-6(i).

**Potential to Emit After Revision**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Process/facility	Potential to Emit after Issuance (tons/year)						
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPS
Existing Natural Gas-Fired Space Heaters	<del>Neg.</del> <b>0.01</b>	<del>0.10</del> <b>0.06</b>	<del>Neg.</del> <b>4.64E-03</b>	<del>0.80</del> <b>0.77</b>	<del>0.70</del> <b>0.65</b>	<del>Neg.</del> <b>0.04</b>	<del>0.04</del> <b>0.015</b>
<del>Existing RV Assembly Processes</del>	17.8	17.8	0	0	0	47.2	17.3

Process/facility	Potential to Emit after Issuance (tons/year)						
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPS
Existing Wood-Working Process	39.4	39.4	0	0	0	0	0
<b>New Natural Gas-Fired Space Heaters</b>	<b>0.01</b>	<b>0.06</b>	<b>4.64E-03</b>	<b>0.77</b>	<b>0.65</b>	<b>0.04</b>	<b>0.015</b>
<b>RV-1 Assembly Process</b>	<b>34.0</b>	<b>34.0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>64.8</b>	<b>5.57</b>
<b>RV-2 Assembly Process</b>	<b>17.6</b>	<b>17.6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>34.2</b>	<b>2.93</b>
Total Emissions	<b>91.0</b>	<b>91.1</b>	<b>9.28E-03</b>	<b>1.55</b>	<b>1.30</b>	<b>99.0</b>	<b>8.53</b>

The potential to emit of the criteria pollutants from the entire source will continue to be less than the Title V major source thresholds, as shown above and as included in MSOP No.:087-15238-00052, issued November 20, 2002. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply to this source.

<b>County Attainment Status</b>
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The source is located in LaGrange County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) LaGrange County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) LaGrange 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. See the State Rule Applicability - Entire Source section.

- (d) **Fugitive Emissions**  
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/year)
PM	57.2
PM10	57.3
SO <sub>2</sub>	0.005
VOC	47.2
CO	0.65
NO <sub>x</sub>	0.77

- (a) This existing source is not a major stationary source because no attainment regulated pollutant under PSD is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the potential to emit calculations for the source (see Appendix A of MSOP No. 087-15238-00052, issued November 20, 2002).

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Significant Permit Revision, SPR No. 087-24028-00052, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. For any change or modification that results in potential to emit of any criteria pollutant equal to or greater than 100 tons per year, the Permittee shall obtain prior approval from IDEM, OAQ.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the revision to this source.
- (b) The requirements of 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products are not included in this revision for the source because HAP emissions are less than major source threshold levels.
- (c) The requirements of 40 CFR Part 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production are not included in this revision for the source because HAP emissions are less than major source threshold levels.

- (d) The requirements of 40 CFR Part 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing are not included in this revision for the source because HAP emissions are less than major source threshold levels.
- (e) The requirements of 40 CFR Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products are not included in this revision for the source because HAP emissions are less than major source threshold levels.

<b>State Rule Applicability - Entire Source</b>
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**326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

The source was constructed in the early 1990s and is not in 1 of the 28 source categories. It was issued MSOP No.: 087-15238-00052 on November 20, 2002. The Technical Support Document (TSD) for the MSOP (No.15238) listed the unrestricted potential emissions of particulate and VOC from the entire source equal to 57.2 and 47.2 tons per year, respectively.

On December 5, 2006, the Permittee submitted an application to the IDEM, OAQ requesting to modify the existing RV assembly area such that it operates as two (2) separate production lines (identified as RV-1 and RV-2), each consisting of five (5) processing facilities. The Permittee also requested to add two (2) table saws to the existing woodworking process and three (3) space heaters. The maximum throughput capacity of the wood working process will continue to remain 600 pounds per hour. After these revisions, the potential to emit of each criteria pollutant remains less than 250 tons per year. Therefore, the provisions of 326 IAC 2-2 (PSD) do not apply.

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

This source is not subject to the periodic reporting requirements of 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Operating Program) and the potential to emit of lead (Pb) is less than five (5) tons per year. However, pursuant to 326 IAC 2-6-1(b), the Permittee is subject to additional information requests in 326 IAC 2-6-5.

**326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAPs))**

The source, including this revision, will continue to emit less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for any combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1-1 do not apply.

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

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

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

## State Rule Applicability - RV Assembly Process

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

The surface coating facilities in RV-1 and RV-2 assembly processes are subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because these facilities use more than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2(d), the Permittee shall comply with the following provisions:

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

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

The provisions of 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations) are not included in this revision for the source because the recreational vehicles assembly processes (RV-1 and RV-2) do not surface coat automobile and light duty truck bodies. They only coat prefinished lumber used in wood furnishings, metal, and plastic surfaces.

### 326 IAC 8-2-6 (Metal Furniture Coating Operations)

The provisions of 326 IAC 8-2-6 (Metal Furniture Coating Operations) are not included in this revision for the source because this source does not coat metal furniture. The coatings and glue are applied to the metal parts used in recreational vehicles.

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

The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are included in this revision for the source because the actual VOC emissions are greater than fifteen (15) pounds per day and the RV assembly process coats metal parts. Therefore, pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations):

When coating metal parts, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried or forced warm air dried coatings.

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

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by 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.

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

These surface coating facilities are not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because the source does not apply any coatings and glue to wood furniture or cabinets. The coatings and glue are applied to prefinished lumber used in recreational vehicles parts.

The provisions of 326 IAC 8-2-12 contained in MSOP M087-15238-00052, issued November 20, 2002, were included erroneously.

**326 IAC 8-2-10 (Flatwood Panel Manufacturing)**

The provisions of 326 IAC 8-2-10 (Flatwood Panel Manufacturing) are not included in this revision for the source because this source does not coat flatwood panels as described under 326 IAC 8-2-10(a).

**State Rule Applicability - Woodworking**

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

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

The pounds per hour limitation is calculated using the following equation:

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

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

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

**State Rule Applicability - Six (6) Natural-Gas Fired Combustion Units**

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

<b>Proposed Changes</b>
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The following revisions have been made to MSOP No. M087-15238-00052, issued November 20, 2002 due to the proposed modification. New language is shown in bold and deleted language is shown in strikeout. The Table of Contents has been updated as necessary.

1. Sections A.2 and D.1 were updated to incorporate the new modifications as shown:

**A.2 Emissions units and Pollution Control Equipment Summary**

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

- ~~(a)~~ One (1) RV assembly area, processing finished recreational vehicles at a maximum rate of 1.5 vehicles per hour (36 vehicles per day);
- (1) Metal department with a maximum usage rate of 2.01 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 2.06 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.64 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.66 gallons of cleaning solvents per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.56 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- (b) One (1) RV assembly area (identified as RV-2) processing finished RVs, with a maximum throughput rate of 19 vehicles per day in a batch operation and consisting of the following processes:
- (1) Metal department with a maximum usage rate of 1.06 gallons of coating material per hour;
  - (2) Exterior caulk facility with a maximum usage rate of 1.08 gallons of material (caulk) per hour;
  - (3) Floors and plumbing facility with a maximum usage rate of 0.34 gallons of material (adhesives, caulks, cleaners) per hour;
  - (4) Cleaning process with a maximum usage rate of 0.35 gallons of cleaning solvent per hour; and
  - (5) Final assembly area with a maximum usage rate of 0.30 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.
- ~~(b)~~(c) One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour **and with particulate emissions controlled by a dust collector and exhausting at stack vent VBH-1;** and
- ~~(c)~~(d) ~~Three (3) 0.6 MMBtu/hr~~ **Six (6)** natural gas fired space heaters, (identified as A1, A2, and A3 through A6) with a total combined heat input capacity of 3.60 MMBtu per hour, with emissions ~~exhausted~~ **exhausting** through Stacks A1, A2, and A3 through A6.

**SECTION D.1** ~~EMISSIONS UNIT OPERATION CONDITIONS~~

- ~~(a)~~ One (1) RV assembly area, processing finished recreational vehicles at a maximum rate of 1.5 vehicles per hour (36 vehicles per day);
- ~~(b)~~ One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour; and
- ~~(c)~~ Three (3) 0.6 MMBtu/hr natural gas fired space heaters, identified as A1, A2, and A3, with emissions exhausted through Stacks A1, A2, and A3.

(The information describing the process contained in this facility description box is descriptive

~~information and does not constitute enforceable conditions.)~~

~~D.1.1 VOC Emission Limit [326 IAC 8-1-6]~~

~~The owner or operator shall limit the VOC containing material usage from the materials not subject to the requirements of Condition D.1.2 such that the associated VOC emissions are less than or equal to twenty five (25) tons per year, based on a 12 month rolling total. Compliance with this limit makes 326 IAC 8-1-6 not applicable in this case.~~

~~D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]~~

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

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

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

~~D.1.3 Particulate Matter (PM), Woodworking Process [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the woodworking process for a process weight rate of 0.3 tons per hour, shall not exceed 1.83 lb/hr.~~

$$E = 4.10 * P^{\Delta 0.67}$$

~~where: E = rate of emission in pounds per hour,  
P = process weight in tons per hour (0.3 tons/hr)~~

~~D.1.4 Particulate Matter (PM), RV Assembly Area [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2(d), the owner or operator shall, for all coating application areas in the RV assembly area except the Alpha 8011 and Alpha Sealant application areas, meet the following requirements:~~

- ~~(a) The owner or operator shall, apply each surface coating in accordance with the manufacturer's specifications.~~
- ~~(b) If overspray accumulates on the ground, the owner or operator shall:~~
- ~~(1) take corrective action and/or make adjustments so that no overspray is visibly detectable at the exhaust or accumulates on the ground;~~
- ~~and~~
- ~~(2) record all actions required as a result of the requirements of Part (b)(1) of this Condition and the changes in operation that are made to ensure that overspray is not visibly detected at the exhaust or accumulates on the ground.~~

~~D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for the emission units and any control devices.~~

## **Compliance Determination Requirements**

### **D.1.6 Testing Requirements [326 IAC 2-1.1-11]**

~~The Permittee is not required to test this emissions units of this source at this time. However, IDEM may require compliance testing when necessary. If testing is required by IDEM, compliance with the PM and VOC limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.~~

### **D.1.7 Volatile Organic Compounds (VOC)**

~~To determine compliance with the VOC emission limit of Condition D.1.1, the owner or operator shall:~~

- ~~(a) draft a list of all applicable materials that contain VOCs;~~
- ~~(b) obtain as-supplied and as-applied VOC data sheets for each material specified in the list required in Part (a) of this condition; and~~
- ~~(c) determine the individual material and entire source VOC emissions, and the 12-month rolling total VOC emissions as follows:~~

- ~~(1) Individual Monthly VOC Emissions:~~

$$\text{Tons VOC/month} = (\text{density lb/gal} * (\text{fraction VOC (excluding water)}) * \text{gal/month} * 1/2000 \text{ ton/lb})$$

- ~~(2) Source Monthly VOC Emissions:~~

$$\text{Tons VOC/month} = \text{sum [individual monthly VOC emissions (tons/month)]}$$

- ~~(3) 12-Month Rolling Total:~~

$$\text{12-Month Rolling Total (ton/yr)} = \text{tons VOC this month (ton/mo)} + \text{tons VOC last 11 months (ton/month)}$$

~~utilizing information obtained from the as-supplied and as-applied VOC data sheets and actual material usage for each applicable month.~~

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

### **D.1.8 Record Keeping Requirements**

- ~~(a) To document compliance with the VOC limit of Condition D.1.1, the owner or operator shall on a monthly basis:~~

- ~~(1) maintain and update as necessary, the materials list required in Part (a) of Condition D.1.7;~~
- ~~(2) maintain and update as necessary, the as-supplied and as-applied VOC data sheets required in Part (b) of Condition D.1.7; and~~
- ~~(3) maintain records of the monthly VOC emissions required in Part (c) of Condition D.1.7(c), including in the record:
  - ~~(A) the applicable month and year,~~
  - ~~(B) the monthly material usage in gallons per month,~~
  - ~~(C) the fraction VOC of each material,~~~~

- ~~(D) — the individual VOC emissions in tons per month,~~
- ~~(E) — the total source VOC emissions in tons per month, and~~
- ~~(F) — the 12 month rolling total emissions in tons per year.~~

~~Said records shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.~~

- ~~(b) — To document compliance with the PM overspray limit of Condition D.1.4, the owner or operator shall maintain records of all actions recorded as a result of the requirements of Condition D.1.4(b).~~

~~All records shall be maintained in accordance with Section C — General Record Keeping Requirements, of this permit.~~

#### D.1.9 — Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address(es) 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.~~

**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:**

- (a) **One (1) RV assembly area (identified as RV-1) processing finished RVs, with a maximum throughput rate of 36 vehicles per day in a batch operation and consisting of the following processes:**
- (1) **Metal department with a maximum usage rate of 2.01 gallons of coating material per hour;**
  - (2) **Exterior caulk facility with a maximum usage rate of 2.06 gallons of material (caulk) per hour;**
  - (3) **Floors and plumbing facility with a maximum usage rate of 0.64 gallons of material (adhesives, caulks, cleaners) per hour;**
  - (4) **Cleaning process with a maximum usage rate of 0.66 gallons of cleaning solvents per hour; and**
  - (5) **Final assembly area with a maximum usage rate of 0.56 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.**
- (b) **One (1) RV assembly area (identified as RV-2) processing finished RVs, with a maximum throughput rate of 19 vehicles per day in a batch operation and consisting of the following processes:**
- (1) **Metal department with a maximum usage rate of 1.06 gallons of coating material per hour;**
  - (2) **Exterior caulk facility with a maximum usage rate of 1.08 gallons of material (caulk) per hour;**
  - (3) **Floors and plumbing facility with a maximum usage rate of 0.34 gallons of material (adhesives, caulks, cleaners) per hour;**
  - (4) **Cleaning process with a maximum usage rate of 0.35 gallons of cleaning solvent per hour; and**
  - (5) **Final assembly area with a maximum usage rate of 0.30 gallons of material (touchup spray paint, cleaners, and adhesives) per hour.**

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

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

**D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9, when coating metal parts, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried or forced warm air dried coatings.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

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

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

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

#### **Compliance Determination Requirements**

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

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- (a) Compliance with the VOC content contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4; or
- (b) Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by 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.

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

#### **D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily, and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used, less water.

- (2) The amount of coating material and solvent used on a daily basis.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The volume weighted average VOC content of the coatings used for each day.
- (4) The daily cleanup solvent usage; and
- (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (c) One (1) woodworking process, processing pre-finished lumber at a maximum rate of 600 pounds per hour and with particulate emissions controlled by a dust collector and exhausting at stack vent VBH-1; and

(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 2-6.1-5(a)(1)]

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

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

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

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

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

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

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

In order to comply with Condition D.2.1, the dust collector for particulate control shall be in operation and control emissions from the wood working facility at all times that the wood working facility is in operation.

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

### ~~Minor Source Operating Permit~~ ~~Quarterly Report~~

Source Name: \_\_\_\_\_ Forest River, Inc. \_\_\_\_\_  
 Source Address: \_\_\_\_\_ 402 Lehman Avenue, Topeka, Indiana 46571 \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ P. O. Box 3030 Elkhart, Indiana 46515-3030 \_\_\_\_\_  
 MSOP No.: \_\_\_\_\_ 087-15238-00052 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Entire Source \_\_\_\_\_  
 Parameter: \_\_\_\_\_ VOC Emissions from the materials not subject to the requirements of 326 IAC 8-2-12 \_\_\_\_\_  
 Limit: \_\_\_\_\_ Less than 25 tons VOC/yr per twelve (12) month period \_\_\_\_\_

YEAR: \_\_\_\_\_

Month	VOC Emissions This Month (tons)	VOC Emissions From Previous 11 Months (tons)	VOC Emissions for Twelve (12) Month Period (tons)
1			
2			
3			

~~9~~ No deviation occurred in this quarter.

~~9~~ Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Upon further review, IDEM, OAQ has decided to make the following changes to Sections B and C:

1. IDEM, OAQ has included several general permit conditions in Section B for the Permittee which will ensure that the Permittee can demonstrate compliance with the State and Federal regulations on a continuous basis.
2. Indiana has included the Credible Evidence condition in the permit pursuant to the provisions in 326 IAC 1-1-6. The rule has been in effect since March 16, 2005.
3. Particulate emission limitations for processes with process weight less than 100 pounds per hour was included in Section C, because its mandatory for counties not listed in 326 IAC 6-5 or 326 IAC 6.8.
4. Preventive Maintenance Plan, Permit Revision, Inspection and Entry, Transfer of Ownership or Operation, and Annual Notification conditions listed under Section C were deleted because they are now included in Section B.

5. Asbestos abatement projects condition pursuant to 326 IAC 14-10, 326 IAC 18, and 40 CFR 61, Subpart M was included in Section C.
6. PSD Minor Source status condition C.1 was deleted because the potential to emit of each criteria pollutant is less than 250 tons per year.
7. IDEM, OAQ has decided to remove the information regarding the Authorized Individual from Section A.1 of the permit. Listing the name and/or title in the permit has resulted in unnecessary administrative amendments in the past. Therefore, IDEM, OAQ does not consider it beneficial to maintain or update this information in the permits. IDEM, OAQ will continue to retain this information up-to-date in their permit tracking system.

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

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The Permittee owns and operates a recreational vehicle manufacturing operation.

Authorized Individual: ~~William Conway~~  
Source Address: 402 Lehman Avenue, Topeka, Indiana 46571  
Mailing Address: P. O. Box 3030 Elkhart, Indiana 46515-3030  
Phone Number: 219-533-5934  
SIC Code: 3792  
County Location: LaGrange  
County Status: Attainment or unclassifiable for all criteria pollutants  
Source Status: Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

**SECTION B ~~GENERAL CONSTRUCTION CONDITIONS~~**

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

~~B.1 Permit No Defense [IC 13]~~

---

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

~~B.2 Definitions~~

---

~~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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.~~

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

---

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

~~B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]~~

---

~~Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.~~

~~B.5 Modification to Permit [326 IAC 2]~~

---

~~Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).~~

~~B.6 Minor Source Operating Permit [326 IAC 2-6.1]~~

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~~This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:~~

- ~~(a) — The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.~~
- ~~(1) — If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.~~
- ~~(2) — If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.~~
- ~~(b) — If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.~~
- ~~(c) — Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.~~
- ~~(d) — The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).~~
- ~~(e) — Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.~~

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

- ~~(a) The total source potential to emit of all criteria pollutants are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
- ~~(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.~~

~~C.2 Preventive Maintenance Plan [326 IAC 1-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
  - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;~~
  - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~~~
- ~~(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~
- ~~(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.~~

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

- ~~(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

- ~~(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice only change. [326 IAC 2-6.1-6(d)]~~

~~C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]~~

~~Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as~~

~~such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:~~

- ~~(a) — Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- ~~(b) — Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;~~
- ~~(c) — Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;~~
- ~~(d) — Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- ~~(e) — Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

~~C.5 — Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]~~

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

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

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

~~C.6 — Permit Revocation [326 IAC 2-1-9]~~

---

~~Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:~~

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

~~C.7 — Opacity [326 IAC 5-1]~~

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~~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.8 Fugitive Dust Emissions [326 IAC 6-4]~~

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~~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). 326 IAC 6-4-2(4) is not federally enforceable.~~

~~C.9 Stack Height [326 IAC 1-7]~~

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

### Testing Requirements

~~C.10 Performance Testing [326 IAC 3-6]~~

---

- ~~(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

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

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

~~no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

- ~~(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.~~

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

### Compliance Monitoring Requirements

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

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

~~C.12 Monitoring Methods [326 IAC 3]~~

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

**Record Keeping and Reporting Requirements**

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

---

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

- ~~(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.~~
- ~~(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.~~
- ~~(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).~~
- ~~(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]~~

~~C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

---

- ~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- ~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- ~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- ~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- ~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

~~C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]~~

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- ~~(a) — Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) — Records of required monitoring information shall include, where applicable:~~
- ~~(1) — The date, place, and time of sampling or measurements;~~
  - ~~(2) — The dates analyses were performed;~~
  - ~~(3) — The company or entity performing the analyses;~~
  - ~~(4) — The analytic techniques or methods used;~~
  - ~~(5) — The results of such analyses; and~~
  - ~~(6) — The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) — Support information shall include, where applicable:~~
- ~~(1) — Copies of all reports required by this permit;~~
  - ~~(2) — All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) — All calibration and maintenance records;~~
  - ~~(4) — Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C—Compliance Monitoring Plan—Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- ~~(d) — All record keeping requirements not already legally required shall be implemented when operation begins.~~

~~C.16 — General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

- ~~(a) — To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(b) — The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

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

- ~~(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, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) A malfunction as described in 326 IAC 1-6-2; or~~
  - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~

~~C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

- ~~(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.~~
- ~~(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~
- ~~(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:~~
- ~~Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015~~
- ~~(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~



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

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

---

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

**B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5] [IC13-15-3-6(a)]**

---

- (a) This permit, M087-15238-00052, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

---

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

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

**B.4 Enforceability**

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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**

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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**

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

**B.7 Duty to Provide Information**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1. 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**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an “authorized individual” of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An “authorized individual” is defined at 326 IAC 2-1.1-1(1).

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

---

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

## **B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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

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

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

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

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M087-15238-00052 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

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

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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 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination,

**the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.**

**B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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

(b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

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

**Any such application shall be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).**

(c) **The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 2-6.1-6(d)]**

**B.15 Source Modification Requirement**

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**A modification, construction, or reconstruction is governed by 326 IAC 2.**

**B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

(a) **Enter upon the Permittee’s premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;**

(b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;**

(c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;**

(d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and**

(e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.**

**B.17 Transfer of Ownership or Operation [326 IAC 2-6.1-6]**

---

(a) **The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.19 Credible Evidence [326 IAC 1-1-6]**

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

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (d) **Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.**
- (e) **For any cause which establishes in the judgment of IDEM, OAQ, the fact that continuance of this permit is not consistent with purposes of this article.**

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

**C.5 Stack Height [326 IAC 1-7]**

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

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
  - (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
  - (2) **If there is a change in the following:**
    - (A) **Asbestos removal or demolition start date;**
    - (B) **Removal or demolition contractor; or**
    - (C) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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 the 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]

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

#### Compliance Monitoring Requirements

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

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

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

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

#### Corrective Actions and Response Steps

##### C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

#### Record Keeping and Reporting Requirements

##### C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) **A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.**
- (b) **When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.**
- (c) **Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).**
- (d) **Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]**

**C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

**C.14 General Reporting Requirements [326 IAC 2-1.1-1(1)] [326 IAC 2-6.1-5] [IC 13-14-1-13]**

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- (a) **Reports required by conditions in Section D of this permit shall be submitted to:**  
  
**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**
- (b) **Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**
- (c) **Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the**

**purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.**

8. The facsimile number for IDEM, OAQ was changed from (317) 233-5967 to (317) 233-6865.

MALFUNCTION REPORT

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

**Conclusion**

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed Significant Permit Revision to a Minor Source Operating Permit No. 087-24028-00052.

**Appendix A: Emission Calculations  
Natural Gas-Fired Space Heaters**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Pit ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

Heat Input Capacity  
(MMBtu/hour)

Potential Throughput  
(MMSCF/year)

1.80 (Total of 3 units)

15

	Pollutant					
Emission Factor (lb/MMSCF)	* PM 1.90	* PM10 7.60	SO <sub>2</sub> 0.60	** NO <sub>x</sub> 100	VOC 5.5	CO 84.0
Potential To Emit (tons/year)	0.01	0.06	4.64E-03	0.77	0.04	0.65

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

\*\*Emission factor for NO<sub>x</sub>: Uncontrolled = 100 lb/MMSCF.

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

**METHODOLOGY**

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 MMSCF/1020 MMBtu

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

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas-Fired Units**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Plt ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

**HAPs - Organics**

Emission Factor (lb/MMSCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.62E-05	9.28E-06	5.80E-04	1.39E-02	2.63E-05

**HAPs - Metals**

Emission Factor (lb/MMSCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	3.86E-06	8.50E-06	1.08E-05	2.94E-06	1.62E-05

**Total HAPs (tons/year) = 0.015**

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From RV Assembly Area (RV-1)**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Plt ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

**RV-1 Assembly Process**

Unit ID	Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % VOC	Volume % Water	Pounds VOC Per Gallon of Coating Less Water	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	Weight % Solids	Transfer Efficiency (%)	PTE of PM/PM10 (tons/year)
<b>Metal Department</b>												
(substrate - fiberglass)	Clear Antiwick Adhesive	8.34	0.0253	1.50	3.00%	0%	0.25	0.01	0.04	97%	100%	0.00
(substrate - wood)	Econobond 29	5.75	0.1515	1.50	55.0%	0%	3.16	0.72	3.15	45%	55%	1.16
(substrate - metal)	DAP 55276 Black Spray Paint	5.50	0.0284	1.50	82.0%	0%	4.51	0.19	0.84	18%	55%	0.08
(substrate - metal)	Caulk - Dicolor 502 Tube	9.75	0.3056	1.50	33.6%	0%	3.28	1.50	6.58	66%	100%	0.00
(substrate - metal)	Caulk - Dicolor 502 Pail	9.75	0.1692	1.50	33.6%	0%	3.28	0.83	3.64	66%	100%	0.00
(substrate - metal)	Royal Adhesive	9.34	0.6629	1.50	3.00%	0%	0.28	0.28	1.22	97%	100%	0.00
									<b>15.5</b>			0.00
<b>Exterior Caulk Facility</b>												
(substrate - metal)	Geocel 2300 MH/RV	7.99	0.12	1.50	33.0%	0%	2.64	0.49	2.1	67%	55%	1.96
(substrate - metal)	Geocel 2350 MH/RV	8.24	1.17	1.50	33.0%	0%	2.72	4.77	20.9	67%	55%	19.1
(substrate - metal)	Geocel All-in-One Clear Caulk	12.4	0.08	1.50	0.01%	0%	0.001	9.83E-05	4.31E-04	100%	100%	0.00
									<b>23.1</b>			0.00
<b>Floors &amp; Plumbing</b>												
(substrate - wood)	Beats the Nail Caulk	10.9	0.330	1.50	25.5%	0%	2.78	1.37	6.01	75%	100%	0.00
NA	Cyclo Max Clean	8.34	0.005	1.50	10.00%	0%	0.83	0.01	0.03	90%	55%	0.12
(substrate - plastic)	Red Devil Holding Tank Caulk	11.7	0.038	1.50	5.00%	0%	0.58	0.03	0.15	95%	100%	0.00
(substrate - wood)	Sheet Floor Adhesive	9.42	0.020	1.50	0.03%	0%	0.00	0.00	0.00	100%	55%	0.56
(substrate - plastic)	ABS Black Cement	7.26	0.024	1.50	69.0%	0%	5.01	0.18	0.77	31%	100%	0.00
(substrate - plastic)	ABS Yellow Cement	7.09	0.010	1.50	70.5%	0%	5.00	0.07	0.32	30%	100%	0.00
(substrate - plastic)	CSA Pipe Dope Reactor Seal	11.8	0.001	1.50	17.0%	0%	2.01	0.0030	0.013	83%	100%	0.00
(substrate - plastic)	Yellow Label Cleaner	6.59	0.0025	1.50	0.76%	0%	0.05	0.0002	0.001	99%	55%	0.05
									<b>7.29</b>			0.00
<b>Cleaning Process</b>												
NA	CNV 12022 Foam Spray Cleaner	6.58	0.0057	1.50	15%	0%	0.99	0.0084	0.04	85%	55%	0.09
NA	Cyclo Brake Cleaner	6.46	0.1420	1.50	70%	0%	4.53	0.9646	4.22	30%	55%	0.81
NA	Mineral Spirits	6.43	0.2000	1.50	100%	0%	6.43	1.9290	8.45	0%	55%	0.00
NA	Iso-Propyl Alcohol	6.60	0.0253	1.50	100%	0%	6.60	0.2505	1.10	0%	55%	0.00
NA	Denatured Alcohol	6.60	0.0694	1.50	100%	0%	6.60	0.6871	3.01	0%	55%	0.00
									<b>16.8</b>			0.00
<b>Assembly Final</b>												
(substrate - wood)	Web 76 Spray Glue	5.73	0.0142	1.50	65%	0%	3.72	0.0793	0.35	35%	55%	0.08
(substrate - metal)	CNV 12021 Black Foam Spray	8.42	0.0227	1.50	12%	0%	1.01	0.0344	0.15	88%	55%	0.50
(substrate - metal)	Cyclo C-33 Spray	5.25	0.0189	1.50	92%	0%	4.83	0.1369	0.60	8.0%	55%	0.02
NA	Crazy Clean	8.34	0.0038	1.50	10%	0%	0.83	0.0048	0.02	90%	55%	0.08
NA	Sprayway Glass Cleaner	7.99	0.0051	1.50	15%	0%	1.20	0.0092	0.04	85%	55%	0.10
(substrate - wood)	Black Latex Paint	10.6	0.3030	1.50	3%	0%	0.32	0.1445	0.63	97%	55%	9.21
(substrate - plastic)	3 M Primer	6.83	0.0088	1.50	92%	0%	6.28	0.0829	0.36	8.0%	55%	0.01
									<b>2.16</b>			0.00

**Total (tons/year) = 64.8 34.0**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) \* Weight % VOC \* 1/(1- Volume % Water)  
 PTE of VOC (lbs/hour) = Density (lb/gal) \* Max. Usage Rate (gal/unit) \* Max. Throughput Rate (units/hour) \* Weight % VOC  
 PTE of VOC (tons/year) = Density (lb/gal) \* Max. Usage Rate (gal/unit) \* Max. Throughput Rate (units/hour) \* Weight % VOC \* 8760 hours/year \* 1 ton/2000 lbs  
 PTE of PM/PM10 (tons/yr) = Density (lb/gal) \* Max.Usage Rate (gal/unit) \* Max.Throughput Rate (unit/hour) \* Weight % Solids \* (1-Transfer Efficiency %) \* 8760 hrs/yr \* 1 ton/2000 lbs

Actual VOC emissions (lbs/day) = PTE of VOC from coatings used on metal parts (8.24 lbs/hour) \*  
 Actual VOC (lbs/day) = PTE (lbs/hour) \* 2080 hours/year \* 1year/260 days of operation

**Appendix A: Emission Calculations**  
**HAP Emissions**  
**From RV Assembly Area (RV-1)**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Plt ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

**RV-1 Assembly Process**

Unit ID	Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Ethylbenzene	Weight % Xylene	PTE of Toluene (tons/year)	PTE of Hexane (tons/year)	PTE of Ethylbenzene (tons/year)	PTE of Xylene (tons/year)
<b>Metal Department</b>												
(substrate - wood)	Econobond 29	5.75	0.1515	1.50		18%				1.00		
(substrate - metal)	DAP 55276 Black Spray Paint	5.50	0.0284	1.50	5.0%		5.0%	15%	0.05		0.05	0.15
<b>Floors &amp; Plumbing</b>												
(substrate - wood)	Beats the Nail Caulk	10.9	0.330	1.50		7.5%				1.77		
<b>Cleaning Process</b>												
NA	Cyclo Brake Cleaner	6.46	0.1420	1.50	35%				2.11			
<b>Assembly Final</b>												
(substrate - wood)	Web 76 Spray Glue	5.73	0.0142	1.50		25%				0.13		
(substrate - metal)	Cyclo C-33 Spray	5.25	0.0189	1.50		30%				0.20		
(substrate - plastic)	3 M Primer	6.83	0.0088	1.50	0.50%		5.0%	20.0%	0.002		0.02	0.08

**Total Single HAP (tons/year) = 2.16      3.10      0.07      0.23**  
**Combination of HAPs (tons/year) = 5.57**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
VOC Emissions  
From RV Assembly Area (RV-2)**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Pit ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

**RV-2 Assembly Process**

Unit ID	Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % VOC	Volume % Water	Pounds VOC Per Gallon of Coating Less Water	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	Weight % Solids	Transfer Efficiency (%)	PTE of PM/PM10 (tons/year)
<b>Metal Department</b>												
(substrate - fiberglass)	Clear Antiwick Adhesive	8.34	0.0253	0.79	3.00%	0%	0.25	0.01	0.02		100%	0.00
(substrate - wood)	Econobond 29	5.75	0.1515	0.79	55.0%	0%	3.16	0.38	1.66	45%	55%	0.61
(substrate - metal)	DAP 55276 Black Spray Paint	5.50	0.0284	0.79	82.0%	0%	4.51	0.10	0.44	18%	55%	0.04
(substrate - metal)	Caulk - Dicor 502 Tube	9.75	0.3056	0.79	33.6%	0%	3.28	0.79	3.47	66%	100%	0.00
(substrate - metal)	Caulk - Dicor 502 Pail	9.75	0.1692	0.79	33.6%	0%	3.28	0.44	1.92	66%	100%	0.00
(substrate - metal)	Royal Adhesive	9.34	0.6629	0.79	3.00%	0%	0.28	0.15	0.64	97%	100%	0.00
									<b>8.16</b>			
<b>Exterior Caulk Facility</b>												
(substrate - metal)	Geocel 2300 MH/RV	7.99	0.12	0.79	33.0%	0%	2.64	0.26	1.1	67%	55%	1.03
(substrate - metal)	Geocel 2350 MH/RV	8.24	1.17	0.79	33.0%	0%	2.72	2.52	11.0	67%	55%	10.07
(substrate - metal)	Geocel All-in-One Clear Caulk	12.4	0.08	0.79	0.01%	0%	0.001	5.18E-05	2.27E-04	100%	100%	0.00
									<b>12.2</b>			
<b>Floors &amp; Plumbing</b>												
(substrate - wood)	Beats the Nail Caulk	10.9	0.330	0.79	25.5%	0%	2.78	0.72	3.17	75%	100%	0.00
NA	Cyclo Max Clean	8.34	0.005	0.79	10.00%	0%	0.83	0.00	0.02	90%	55%	0.06
(substrate - plastic)	Red Devil Holding Tank Caulk	11.7	0.038	0.79	5.00%	0%	0.58	0.02	0.08	95%	100%	0.00
(substrate - wood)	Sheet Floor Adhesive	9.42	0.020	0.79	0.03%	0%	0.00	0.00	0.00	100%	100%	0.00
(substrate - plastic)	ABS Black Cement	7.26	0.024	0.79	69.0%	0%	5.01	0.09	0.41	31%	100%	0.00
(substrate - plastic)	ABS Yellow Cement	7.09	0.010	0.79	70.5%	0%	5.00	0.04	0.17	30%	100%	0.00
(substrate - plastic)	CSA Pipe Dope Reactor Seal	11.8	0.001	0.79	17.0%	0%	2.01	0.0016	0.007	83%	100%	0.00
(substrate - plastic)	Yellow Label Cleaner	6.59	0.0025	0.79	0.76%	0%	0.05	0.0001	0.000	99%	55%	0.03
									<b>3.84</b>			
<b>Cleaning Process</b>												
NA	CNV 12022 Foam Spray Cleaner	6.58	0.0057	0.79	15%	0%	0.99	0.0045	0.02	85%	55%	0.05
NA	Cyclo Brake Cleaner	6.46	0.1420	0.79	70%	0%	4.53	0.5086	2.23	30%	55%	0.43
NA	Mineral Spirits	6.43	0.2000	0.79	100%	0%	6.43	1.0172	4.46	0%	55%	0.00
NA	Iso-Propyl Alcohol	6.60	0.0253	0.79	100%	0%	6.60	0.1321	0.58	0%	55%	0.00
NA	Denatured Alcohol	6.60	0.0694	0.79	100%	0%	6.60	0.3623	1.59	0%	55%	0.00
									<b>8.9</b>			
<b>Assembly Final</b>												
(substrate - wood)	Web 76 Spray Glue	5.73	0.0142	0.79	65%	0%	3.72	0.0418	0.18	35%	55%	0.04
(substrate - metal)	CNV 12021 Black Foam Spray	8.42	0.0227	0.79	12%	0%	1.01	0.0181	0.08	88%	55%	0.26
(substrate - metal)	Cyclo C-33 Spray	5.25	0.0189	0.79	92%	0%	4.83	0.0722	0.32	8%	55%	0.01
NA	Crazy Clean	8.34	0.0038	0.79	10%	0%	0.83	0.0025	0.01	90%	55%	0.04
NA	Sprayway Glass Cleaner	7.99	0.0051	0.79	15%	0%	1.20	0.0048	0.02	85%	55%	0.05
(substrate - wood)	Black Latex Paint	10.6	0.3030	0.79	3%	0%	0.32	0.0762	0.33	97%	55%	4.86
(substrate - plastic)	3 M Primer	6.83	0.0088	0.79	92%	0%	6.28	0.0437	0.19	8%	55%	0.01
									<b>1.14</b>			

**Total (tons/year) = 34.2 17.6**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) \* Weight % VOC \* 1/(1- Volume % Water)  
PTE of VOC (lbs/hour) = Density (lb/gal) \* Max. Usage Rate (gal/unit) \* Max. Throughput Rate (units/hour) \* Weight % VOC  
PTE of VOC (tons/year) = Density (lb/gal) \* Max. Usage Rate (gal/unit) \* Max. Throughput Rate (units/hour) \* Weight % VOC \* 8760 hours/year \* 1 ton/2000 lbs  
PTE of PM/PM10 (tons/yr) = Density (lb/gal) \* Max.Usage Rate (gal/unit) \* Max.Throughput Rate (unit/hour) \* Weight % Solids \* (1-Transfer Efficiency %) \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**HAP Emissions**  
**From RV Assembly Area (RV-2)**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Plt ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

**RV-2 Assembly Process**

Unit ID	Material	Density (lb/gal)	Max. Usage Rate (gal/unit)	Max. Throughput Rate (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Ethylbenzene	Weight % Xylene	PTE of Toluene (tons/year)	PTE of Hexane (tons/year)	PTE of Ethylbenzene (tons/year)	PTE of Xylene (tons/year)
<b>Metal Department</b>												
(substrate - wood)	Econobond 29	5.75	0.1515	0.79		18%				0.53		
(substrate - metal)	DAP 55276 Black Spray Paint	5.50	0.0284	0.79	5.0%		5.0%	15%	0.03		0.03	0.08
<b>Floors &amp; Plumbing</b>												
(substrate - wood)	Beats the Nail Caulk	10.9	0.330	0.79		7.5%				0.93		
<b>Cleaning Process</b>												
NA	Cyclo Brake Cleaner	6.46	0.1420	0.79	35%				1.11			
<b>Assembly Final</b>												
(substrate - wood)	Web 76 Spray Glue	5.73	0.0142	0.79		25%				0.07		
(substrate - metal)	Cyclo C-33 Spray	5.25	0.0189	0.79		30%				0.10		
(substrate - plastic)	3 M Primer	6.83	0.0088	0.79	0.50%		5.0%	20.0%	0.001		0.01	0.04

**Total Single HAP (tons/year) =**      1.14              1.63              0.04              0.12  
**Combination of HAPs (tons/year) =**      2.93

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Forest River, Inc. - Cherokee Division  
**Address:** 402 Lehman Avenue, Topeka, Indiana 46571  
**SPR to MSOP:** 087-24028-00052  
**Pit ID:** 087-00052  
**Reviewer:** ERG/SD  
**Date:** March 7, 2007

Process/Emission Units	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Combination of HAPs
<b>Existing Units</b>								
Natural Gas Fired Space Heaters	0.01	0.06	4.64E-03	0.77	0.04	0.65	neg	0.015
RV Assembly Area	17.8	17.8			47.2		8.85	17.3
Wood Working Process	39.4	39.4						
<b>New Units</b>								
Natural Gas Fired Space Heaters	0.01	0.06	4.64E-03	0.77	0.04	0.65	neg	0.015
RV-1 Assembly Process	34.0	34.0			64.8		3.10	5.57
RV-2 Assembly Process	17.6	17.6			34.2		1.63	2.93
	91.0	91.1	9.28E-03	1.55	99.0	1.30	4.73	8.53