INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 15, 2009

RE: Forest River, Inc./ 039-26925-00431

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Forest River, Inc. - U.S. Cargo Division
17645 Commerce Drive; and
17830 Commerce Drive
Bristol, Indiana 46507

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

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

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.: M039-26925-00431	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 15, 2009 Expiration Date: January 15, 2019

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary cargo trailer manufacturing source.

Source Address:	17645 Commerce Drive, Bristol, Indiana 46507; and 17830 Commerce Drive, Bristol, Indiana 46507
Mailing Address:	PO Box 3030, Elkhart, IN 46514
General Source Phone Number:	574-534-6913
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) wood working facility, having a maximum throughput capacity of six hundred (600) pounds of plywood per hour, controlled by three (3) baghouses, and exhausting to stacks D-1, D-2 and D-3. This facility was constructed in 1997**.**

(b) Surface coating operations, consisting of:

(1) A paint shop consisting of two (2) spray booths using high volume low pressure (HVLP) guns to coat metal and plywood, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a maximum throughput rate of one and forty-seven hundredths (1.47) gallons per hour, and exhausting to stacks SV-4 and SV-5. This facility was constructed in 1997.

(2) Two (2) trailer assembly areas applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a maximum usage rate of fifty hundredths (0.50) gallons per hour. This facility was constructed in 1997.

(3) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.

(c) Two (2) metal inert gas (MIG) welding operations, constructed in 1997 and consisting of:

(1) Twenty-five (25) welding stations consuming a total of eight hundred thirty-three ten-thousandths (0.833) pounds of electrode per hour.

(2) Seventeen (17) welding stations consuming a total of one and twenty hundredths (1.20) pounds of electrode per hour.

(d) Natural gas fired combustion units, constructed in 1997, and consisting of:

(1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of sixteen hundredths (0.16) MMBtu per hour.

(2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of two and sixty hundredths (2.60) MMBtu per hour.

(3) Two (2) natural gas-fired burners, each with a maximum heat input capacity of four and twenty-five hundredths (4.25) MMBtu per hour.

(4) Three (3) natural gas-fired drying ovens, uncontrolled and exhausting to the indoors, and consisting of:

(A) Drying oven 1 has a maximum heat input capacity of five (5.00) MMBtu per hour;

(B) Drying oven 2 has a maximum heat input capacity of one and six tenths (1.6) MMBtu per hour; and

(C) Drying oven 3 has a maximum heat input capacity of three and five tenths (3.5) MMBtu per hour.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M039-26925-00431, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) All terms and conditions of permits established prior to M039-26925-00431 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 one hundred twenty (120) days 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) 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]

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 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] [IC 13-17-3-2] [IC 13-30-3-1]

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

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

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

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

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, 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 Operational Control [326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(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]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.7 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 demolitions 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
MC 61-52 IGCN 1003
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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 an "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 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports, and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial startup, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Units Description:

(a) One (1) wood working facility, having a maximum throughput capacity of six hundred (600) pounds of plywood per hour, controlled by three (3) baghouses, and exhausting to stacks D-1, D-2 and D-3. This facility was constructed in 1997**.**

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the one (1) woodworking facility shall not exceed one and eighty-three hundredths (1.83) pounds per hour when operating at a process weight rate of six hundred (600) pounds per hour.

The pound 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

Compliance Determination Requirements

D.1.2 Particulate Control

(a) In order to comply with Condition D.1.1, the three (3) baghouses for particulate control shall be in operation and control emissions from the one (1) woodworking facility at all times that the one (1) woodworking facility is in operation.

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

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

D.1.3 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

SECTION D.2 EMMISIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(b) Surface Coating Operations, consisting of:

(1) A paint shop consisting of two (2) spray booths using high volume low pressure (HVLP) guns to coat metal and plywood, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a maximum throughput rate of one and forty-seven hundredths (1.47) gallons per hour, and exhausting to stacks SV-4 and SV-5. This facility was constructed in 1997.

(2) Two (2) trailer assembly areas applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a maximum usage rate of fifty hundredths (0.50) gallons per hour. This facility was constructed in 1997.

(3) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.

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

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(d)(2), the Permittee 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, for air dried or forced warm air dried coatings, as delivered to the applicator at the two (2) spray booths, located in the paint shop.

(b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from 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.2.2 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the dry particulate filters for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the paint shop (consisting of two (2) spray booths) at all times when each of the spray booths, are in operation.

(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.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour. Therefore, the one (1) powder coating booth shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.5 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Forest River, Inc. - U.S. Cargo Division
Source Address: 17645 Commerce Drive, Bristol, Indiana 46507; and
17830 Commerce Drive, Bristol, Indiana 46507
Mailing Address: PO Box 3030, Elkhart, IN 46514
MSOP No.: M039-26925-00431

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Forest River, Inc. - U.S. Cargo Division
Address:	17645 Commerce Drive; and 17830 Commerce Drive
City:	Bristol, Indiana 46507
Phone #:	574-534-6913
MSOP #:	M039-26925-00431

I hereby certify that Forest River, Inc. - U.S. Cargo Division is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Forest River, Inc. - U.S. Cargo Division is ☐ in compliance with the requirements of MSOP M039-26925-00431.
☐ not in compliance with the requirements of MSOP M039-26925-00431.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

Attach a signed certification to complete this report.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - (317) 233-6865

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Forest River, Inc. - U.S. Cargo Division
Source Location:	17645 Commerce Drive, Bristol, Indiana 46507; and 17830 Commerce Drive, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3799
Permit Renewal No.:	039-26925-00431
Permit Reviewer:	Hannah L. Desrosiers

On 12/10/2008, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Forest River, Inc. - U.S. Cargo Division had applied for a renewal of their MSOP. The notice also stated that the OAQ proposed to issue an MSOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

(a) The permit number in the TSD header was incorrect on the draft and has been revised so that the TSD pairs with the permit, as follows:

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Forest River, Inc. - U.S. Cargo Division
Source Location:	17645 Commerce Drive, Bristol, Indiana 46507; and 17830 Commerce Drive, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3799
Permit Renewal No.:	039-26925-00431
Permit Reviewer:	Hannah L. Desrosiers

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Forest River, Inc. - U.S. Cargo Division, relating to the operation of a stationary cargo trailer manufacturing source.

History

On August 28, 2008, the Forest River, Inc.'s U.S. Cargo Division submitted an application to the OAQ requesting to renew its operating permit. The Forest River, Inc.'s U.S. Cargo Division was issued an MSOP on May 18, 2004.

Source Definition

On February 17, 2004, IDEM, OAQ, conducted a source determination and concluded that this source consists of two (2) plants:

(a) Plant 1 is located at 17645 Commerce Drive, Bristol, Indiana 46507.
(b) Plant 2 is located at 17830 Commerce Drive, Bristol, Indiana 46507.

Because these plants are still owned by the same company, still operate under the same SIC code (3799), and are still located on contiguous properties, they will continue to be considered as one source.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) wood working facility, constructed in 1997, having a maximum throughput capacity of six hundred (600) pounds of plywood per hour, controlled by three (3) baghouses, and exhausting to stacks D-1, D-2 and D-3.

(b) Surface coating operations, consisting of:

(1) A paint shop consisting of two (2) spray booths using high volume low pressure (HVLP) guns to coat metal and plywood, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a maximum throughput rate of one and forty-seven hundredths (1.47) gallons per hour, and exhausting to stacks SV-4 and SV-5. This facility was constructed in 1997.

(2) Two (2) trailer assembly areas applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum rated capacity of seven and seventy-five hundredths (7.75) units per hour and a

maximum usage rate of fifty hundredths (0.50) gallons per hour. This facility was constructed in 1997.

(3) One (1) powder coating room, constructed in 2000, with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters and exhausting to the indoors.

(c) Two (2) metal inert gas (MIG) welding operations, constructed in 1997 and consisting of:

(1) Twenty-five (25) welding stations consuming a total of eight hundred thirty-three ten-thousandths (0.833) pounds of electrode per hour.

(2) Seventeen (17) welding stations consuming a total of one and twenty hundredths (1.20) pounds of electrode per hour.

(d) Natural gas-fired combustion sources, constructed in 1997, with heat input equal to or less than ten (10) million Btu per hour, each, as follows;

(1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of sixteen hundredths (0.16) MMBtu per hour.

(2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of two and sixty hundredths (2.60) MMBtu per hour.

(3) Two (2) natural gas-fired burners, each with a maximum heat input capacity of four and twenty-five hundredths (4.25) MMBtu per hour.

(4) Three (3) natural gas-fired drying ovens, uncontrolled and exhausting to the indoors, and consisting of:

(A) Drying oven 1 has a maximum heat input capacity of five (5.00) MMBtu per hour;

(B) Drying oven 2 has a maximum heat input capacity of one and six tenths (1.6) MMBtu per hour; and

(C) Drying oven 3 has a maximum heat input capacity of three and five tenths (3.5) MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from this source during this review process.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

In October 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and is integral to the normal operation of the facility, and therefore, potential emissions were to be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

County Attainment Status

The source is located in Elkhart County. Pursuant to 326 IAC 1-4-7, the following attainment status designations are applicable:

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart 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.

(b) PM2.5

Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include

those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not 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.

Unrestricted Potential Emissions

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	tons/year
PM	23.83
PM10(1)	24.53
PM2.5	24.30
SO2	0.07
NOx	12.23
VOC	13.20
CO	10.27

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10 and VOC is still equal to or greater than 25 tons per year but less than 100 tons per year and the potential to emit of all other criteria pollutants is less than 25 tons per year. Therefore, pursuant to 326 IAC 2-5.1-3, Section (a)(1), and 326 IAC 2-6.1-2, the source is not subject to the provisions of 326 IAC 2-7 and will be issued an MSOP Renewal.

HAPs	tons/year
Toluene	6.51
Xylene	4.86
Ethylbenzene	2.43
Trichloroethylene	1.96
Hexane	1.55
Trichloroethane	0.94
Methylene Chloride	0.71
Tetrachloroethylene	0.64
Manganese	0.13
Formaldehyde	0.01
Total	**19.74**

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

(c) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

Federal Rule Applicability

The following federal rules are applicable to the proposed renewal:

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) 40 CFR 63, Subpart T - NESHAPs for Halogenated Solvent Cleaning
Pursuant to 40 CFR 63.460(a), affected facilities include each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than five (5) percent by weight, as a cleaning and/or drying agent. However, wipe cleaning activities, such as using a rag containing halogenated solvent, or a spray cleaner containing halogenated solvent are specifically exempted. While this existing stationary cargo trailer manufacturing source uses spray cleaners containing halogenated solvents, it does not use any cold solvent cleaning machine of a type listed. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63 Subpart T, still do not apply to this source, and the requirements are not included in this renewal.

(b) 40 CFR 63 Subpart JJ - NESHAP: Wood Furniture Manufacturing
Pursuant to 40 CFR 63.3881, this rule applies to each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source of hazardous air pollutants (HAP) as defined in 40 CFR 63.2. This existing source manufactures cargo trailers not wood furniture or wood furniture components. Additionally, the potential HAP emissions from this existing stationary cargo trailer manufacturing source are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Wood Furniture Manufacturing, 40 CFR 63 Subpart RRRR, still do not apply to this source, and the requirements are not included in this renewal.

(c) 40 CFR 63 Subpart DDDD - NESHAPs: Plywood and Composite Wood Products
Pursuant to 40 CFR 63.2231, this rule applies to a source that owns or operates a plywood and/or composite wood products manufacturing facility, located at a major source of hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.2. This existing source does not manufacture plywood and/or composite wood products; it uses plywood and/or composite wood products to manufacture cargo trailers. Additionally, the unrestricted potential HAP emissions from this existing stationary cargo trailer manufacturing source are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants

(NESHAPs): Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD, still do not apply to this source, and the requirements are not included in this renewal.

(d) 40 CFR 63 Subpart IIII - NESHAPs for Surface Coating of Automobiles and Light Duty Trucks

Pursuant to 40 CFR 63.3081, this rule applies to sources that own or operate a new, reconstructed, or existing affected source, as defined in §63.3082, that, except as noted in 63.3081(b)(1), is located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP), as defined in 40 CFR 63.2. Additionally, source's that own or operate a new, reconstructed, or existing affected source, as defined in §63.3082, in which you choose to include, pursuant to §63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light-duty trucks, or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light-duty trucks, or other motor vehicles; and the affected source is located at a facility that is a major source, is located at a major source, or is part of a major source of emissions of HAP. This existing source applies surface coatings to cargo trailers, not automobile or light-duty truck bodies or body parts for automobiles or light-duty trucks, as defined in 40 CFR 63.3176. Additionally, the potential HAP emissions from this existing stationary cargo trailer manufacturing source are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63 Subpart IIII, still do not apply to this source, and the requirements are not included in this renewal.

(e) 40 CFR 63 Subpart MMMM - NESHAPs for Miscellaneous Metal Parts and Products Surface Coating

Pursuant to 40 CFR 63.3881, this rule applies to sources that own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses nine hundred forty-six (946) liters (two hundred fifty (250) gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in §63.3881(a); and that is a major source, is located at a major source, or is part of a major source of emissions of HAP, as defined in §63.2. Although this existing source applies surface coatings to metal cargo trailer parts, the unrestricted potential HAP emissions are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63 Subpart MMMM, still do not apply to this source, and the requirements are not included in this renewal.

(f) 40 CFR 63 Subpart QQQQ - NESHAPs for Surface Coating of Wood Building Products

Pursuant to 40 CFR 63.3881, this rule applies to sources that own or operate a new, reconstructed, or existing affected source, as defined in §63.4682, in a wood building products surface coating facility that uses 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in §63.4681(a) and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP), as defined in 40 CFR 63.2. Although this existing stationary cargo trailer manufacturing source applies surface coatings to wooden cargo trailer parts (i.e., plywood), the unrestricted potential HAP emissions are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the National Emission Standards for

Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ, still do not apply to this source, and the requirements are not included in this renewal.

(g) 40 CFR 63, Subpart HHHHHH - NESHAPs: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
Pursuant to 40 CFR 63.11170, this rule applies to area sources of HAP as defined in paragraph 63.11170(b), including sources that are part of a tribal, local, State, or Federal facility, who perform the following; paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates, and/or autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, as defined in §63.11180, and/or spray application of coatings containing target HAPs, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180. Although this existing stationary cargo trailer manufacturing source meets the definition of an area source as defined in 40 CFR §63.2, this source does not perform paint stripping using MeCl, or autobody refinishing operations, and the coatings used at this source do not contain any target HAPs as defined in §63.11180. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, do not apply to this source, and the requirements are not included in this renewal.

(h) 40 CFR 63 Subpart QQQQQQ - NESHAPs for Wood Preserving Area Sources
Pursuant to 40 CFR 63.11428, this rule applies to sources that own or operate a new, reconstructed, or existing affected wood preserving operation that is an area source of hazardous air pollutant (HAP) emissions. Although this existing stationary cargo trailer manufacturing source meets the definition of an area source as defined in 40 CFR §63.2, it does not perform wood preserving, as defined in §63.11433, but instead applies surface coatings to metal and wood cargo trailer parts. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63 Subpart QQQQQQ, still do not apply to this source, and the requirements are not included in this renewal.

(i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this renewal.

Compliance Assurance Monitoring (CAM)

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source has been limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability

Entire Source:

(a) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The requirements of this rule apply to the construction of any new major stationary source, as defined in §2-2-1(gg), or any project at an existing major stationary source in an area designated as attainment or unclassifiable in 326 IAC 1-4 (Nonattainment/Attainment/Unclassifiable Area Designations for Sulfur Dioxide, Total Suspended Particulates, Carbon Monoxide, Ozone, and Nitrogen Dioxides). While this

existing stationary cargo trailer manufacturing source is located in an Attainment /Unclassifiable Area for all criteria pollutants, it does not meet the definition of a major stationary source under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply to this source, and are not included in the permit.

(b) 326 IAC 2-3 (Emission Offset)
Pursuant to 326 IAC 2-3-2(a), this rule applies to new major stationary sources or major modifications constructed in an area designated, as of the date of submittal of a complete application, as nonattainment in 326 IAC 1-4, for a pollutant for which the stationary source or modification is major. Elkhart County has been designated as attainment for the 8-hour ozone standard. Additionally, this existing stationary cargo trailer manufacturing source is not considered a major source because the potential emissions for all criteria pollutants are less than the Title V Thresholds. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply to this source, and the requirements are still not included in this renewal.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 326 IAC 2-4.1-1, this rule applies to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997. The unrestricted potential HAP emissions from this existing stationary cargo trailer manufacturing source are less than the Title V Major Source thresholds of ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) still do not apply to this source, see "Unrestricted Potential Emissions" section above, and the requirements are not included in this renewal.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1(a), updated Feb 26, 2004, 3:45 p.m.: 27 IR 2210, this rule applies to any source required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and/or any source located in Lake, Porter, or LaPorte counties that emit volatile organic compounds (VOC) or oxides of nitrogen (NOx) into the ambient air at levels equal to or greater than twenty-five (25) tons per year, and/or any source that emits lead into the ambient air at levels equal to or greater than five (5) tons per year. Additionally, pursuant to 326 IAC 2-6-1(b), all sources permitted by the department are subject to section 5 of this rule, additional information requests. This existing stationary cargo trailer manufacturing source is not required to have an operating permit under 326 IAC 2-7 (Part 70), is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is still only subject to additional information requests as provided in 326 IAC 2-6-5.

(e) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the "Unrestricted Potential Emissions" section above.

(f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-1, this rule applies to opacity, not including condensed water vapor, emitted by or from a facility or source, located anywhere in the state. Section 2(1) of this rule applies to sources or facilities located in areas not otherwise listed in section (1)(c). This existing stationary cargo trailer manufacturing source is located in Elkhart County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided

in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to meet the following, unless otherwise stated in the permit:

(1) 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.

(2) 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.

(g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4-1, this rule applies to all sources of fugitive dust; i.e., the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the existing stationary cargo trailer manufacturing source still 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.

(h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
Pursuant to 326 IAC 6-5-1(b), this rule applies to any new source, located anywhere in the state, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985, and that has potential fugitive particulate matter emissions of twenty-five (25) tons per year or more, unless otherwise regulated by a more stringent New Source Performance Standard (NSPS) (326 IAC 12). This existing stationary cargo trailer manufacturing source, located in Elkhart County, still has total, uncontrolled, potential, fugitive emissions of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 6-5, Fugitive Particulate Matter Emission Limitations, still do not apply to any of the emission units at this source, and are not included in this renewal.

(i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6 new facilities are subject only if they have potential emissions of 25 tons of VOC or more per year, or are not otherwise regulated by other provisions of Article 8. The unlimited potential VOC emissions from the woodworking, welding and natural gas combustion, each, are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 General Reduction Requirements still do not apply to woodworking, welding and natural gas combustion, and are not included in this renewal.

(j) 326 IAC 12-1 (New Source Performance Standards)
Pursuant to 326 IAC 12-1-1, this article applies to the owner or operator of any stationary source and incorporates by reference 40 CFR 60 New Source Performance Standards. If the emission limitations contained in this article conflict with or are inconsistent with any other emission limitations established by this title, then the more stringent limitation shall apply.

(1) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the renewal for this source. See the "Federal Rule Applicability" section of this TSD

(k) 326 IAC 20 (Hazardous Air Pollutants)
Pursuant to 326 IAC 20-1-1, this article applies to any source, or facility anywhere in the state, for which a standard is prescribed under this article unless otherwise specified in

individual standards, and incorporates by reference National Emissions Standards for Hazardous Air Pollutants 40 CFR 63 Subpart A* General Provisions. If the emission limitations contained in this article conflict with or are inconsistent with any other emission limitations established by this title, then the more stringent limitation shall apply.

(1) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the renewal for this source. See the "Federal Rule Applicability" section of this TSD.

Surface Coating Operations

(a) One (1) Paint Shop - consisting of two (2) spray booths

(1) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), this rule establishes emission limitations for particulate emissions from manufacturing processes located anywhere in the state, unless otherwise exempted, and pursuant to 326 IAC 6-3-2(a), surface coating operations using more than five (5) gallons of coating per day, shall follow the work practices and control technologies contained therein.

(A) This existing stationary cargo trailer manufacturing source continues to use more than five (5) gallons of coating per day in the paint shop (consisting of two (2) spray booths), therefore, pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) (40 CFR 52 Subpart P), the particulate matter (PM) from the paint shop, shall still be controlled by dry particulate filters, and the control device shall still be operated in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall still inspect the control device and do either of the following no later than four (4) hours after such observation:

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

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

If overspray is visibly detected, the Permittee shall still 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 still be maintained for five (5) years.

(2) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1(a)(4) and §8-2-9(a)(5), affected facilities include any industrial category which coats metal parts or products under the Standard Industrial Classification Code of major group 37: Transportation Equipment, constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds of VOCs per day before add-on controls.

The paint shop, consisting of two (2) spray booths, constructed in 1997, after the rule applicability date of July 1, 1990, applies coatings to metal cargo trailer

parts, SIC Code 3799: Transportation Equipment, Not Elsewhere Classified, and has actual VOC emissions of greater than fifteen (15) pounds per day. Therefore, this source is subject to 326 IAC 8-2-9 Miscellaneous Metal Coating, and the applicable requirements are included in this renewal.

(A) Pursuant to 326 IAC 8-2-9(d)(4), the volatile organic compound (VOC) content of the coating utilized in the paint shop, consisting of two (2) spray booths, shall be limited to three and five tenths (3.5) pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the MSDS submitted by the source and calculations made, the paint shop can comply with this requirement.

(B) 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.

(3) 326 IAC 8-2-2 (Automobile and light duty truck coating operations)
Pursuant to 326 IAC 8-2-1(a)(2), affected facilities include automobile and light duty truck coating operations, constructed after January 1, 1980, located in any county and which have potential emissions of twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or greater per year of VOC. This source applies surface coatings to commercial cargo trailer frames not automobile or light-duty truck bodies or body parts for automobiles or light-duty trucks, as defined in 40 CFR 63.3176. Additionally, the unlimited potential VOC emissions from each emission unit at this existing source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations) still do not apply to the surface coating operations, including the paint shop (consisting of two (2) spray booths), two (2) trailer assembly facilities, and one (1) powder coating facility, and are not included in this renewal.

(4) 326 IAC 8-2-10 (Flat wood panels; manufacturing operations)
Pursuant to 326 IAC 8-2-1(a), affected facilities include the manufacture and finishing of flat wood panels, constructed after January 1, 1980, located in any county and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. This existing stationary cargo trailer manufacturing source does not perform manufacturing of flat wood panels, and surface coating operations performed the two (2) trailer assembly facilities are not of a type regulated by §§8-2-10(a)(1) through (a)(3), since they only apply protective, not decorative, coatings to commercial grade plywood. Therefore, the requirements of 326 IAC 8-2-10, Flat wood panels; manufacturing operations, still do not apply to the surface coating operations in the paint shop (consisting of two (2) spray booths) and are not included in this renewal.

There are no other Article 8 Rules that apply to the surface coating operations conducted in the Paint Shop.

(b) One (1) Trailer Assembly Area

(1) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), this rule establishes emission limitations for particulate emissions from manufacturing processes located anywhere in the

state, unless otherwise exempted, and pursuant to 326 IAC 6-3-2(a), surface coating operations using more than five (5) gallons of coating per day, shall follow the work practices and control technologies contained therein. Pursuant to 326 IAC 6-3-1(a)(15), surface coating manufacturing processes, using less than five (5) gallons per day are exempted from the rule. The two (2) trailer assembly facilities each continue to use less than five (5) gallons of sealant and adhesives per day; therefore, the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) still do not apply to the two (2) trailer assembly facilities and are not included in this renewal.

(2) 326 IAC 8-2-10 (Flat wood panels; manufacturing operations)
Pursuant to 326 IAC 8-2-1(a), affected facilities include surface coating operations that apply coating to flat wood panels, constructed after January 1, 1980, located in any county and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. This existing stationary cargo trailer manufacturing source does not perform manufacturing of flat wood panels, and surface coating operations performed the two (2) trailer assembly facilities are not of a type regulated by §§8-2-10(a)(1) through (a)(3), since they only apply adhesives to attach insulation to commercial grade plywood. Therefore, the requirements of 326 IAC 8-2-10, Flat wood panels; manufacturing operations, still do not apply to the surface coating operations in the two (2) trailer assembly facilities and are not included in this renewal.

(3) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1(a)(4) and §8-2-9(a)(5), affected facilities include any industrial category which coats metal parts or products under the Standard Industrial Classification Code of major group 37: Transportation Equipment, constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds of VOCs per day before add-on controls. The two (2) trailer assembly facilities only conduct brush or aerosol applied touch-up coatings to metal, and have actual VOC emissions of less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) still do not apply to the surface coating operations in the two (2) trailer assembly facilities and are not included in this renewal.

(4) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6 new facilities are subject only if they have potential emissions of 25 tons of VOC or more per year, or are not otherwise regulated by other provisions of Article 8. The unlimited potential VOC emissions from the two (2) trailer assembly facilities are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 General Reduction Requirements still do not apply to the surface coating operations in the Trailer Assembly Area and are not included in this renewal.

There are no Article 8 Rules that apply to the surface coating operations conducted in the Trailer Assembly Area.

(c) Powder Coating Operations

(1) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), this rule establishes emission limitations for particulate emissions from manufacturing processes located anywhere in the state, unless otherwise exempted, and pursuant to 326 IAC 6-3-2(a), surface

coating operations using more than five (5) gallons of coating per day, shall follow the work practices and control technologies contained therein.

Pursuant to 326 IAC 6-3-1(a), particulate emissions from manufacturing processes, located anywhere in the state, unless specifically exempted by §6-3-1(b) shall follow the work practices and control technologies contained in §6-3-2, subsections (b) through (d), or be limited according to §6-3-2(e), as applicable.

Pursuant to §6-3-2(e), when the process weight rate is less than one hundred (100) pounds per hour, the particulate matter (PM) emissions from the powder coating operations shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

Based on Appendix A, the potential PM emission rate for the powder coating operations, after controls, is:

$$0.38 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.088 \text{ lb/hr}$$

The PM emissions from the powder coating operations, after controls, are 0.088 pounds of PM per hour, which is less than the allowable of 0.551 pounds of PM per hour. Therefore, the powder coating operations are in compliance with this rule.

The dry filters shall be in operation and maintained according to manufacturer's specifications, at all times the powder coating equipment is in operation, in order to comply with this limit.

(2) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1(a)(4) and §8-2-9(a)(5), affected facilities include any industrial category which coats metal parts or products under the Standard Industrial Classification Code of major group 37: Transportation Equipment, constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds of VOCs per day before add-on controls. The one (1) powder coating booth has actual VOC emissions of less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) still do not apply to the Powder Coating Operations and are not included in this renewal.

(4) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6 new facilities are subject only if they have potential emissions of 25 tons of VOC or more per year, or are not otherwise regulated by other provisions of Article 8. The unlimited potential VOC emissions from the one (1) powder coating booth are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 General Reduction Requirements still do not apply to Powder Coating Operations and are not included in this renewal.

There are no Article 8 Rules that apply to the surface coating operations conducted in the Powder Coating Room.

(d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
Pursuant to 326 IAC 8-3-1(a)(2), the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) applies to all new facilities constructed after January 1, 1980, performing organic solvent degreasing operations, using organic materials (solvents) containing

volatile organic compounds (VOCs) (as defined by 326 IAC 1-2-90), which are liquid at standard conditions and which are used as dissolvers, viscosity reducers, or cleaning agents, located anywhere in the state. The miscellaneous cleanup solvent activities performed in the paint room, trailer assembly area and the powder coating room, are each not of a type as described in subdivisions in 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, the requirements of 326 IAC 8-3-2 still do not apply to the cleanup solvent usage at this source, and are not included in this renewal.

Woodworking Facility

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), particulate emissions from manufacturing processes, located anywhere in the state, unless specifically exempted by §6-3-1(b) shall follow the work practices and control technologies contained in §6-3-2, subsections (b) through (d), or be limited according to §6-3-2(e), as applicable.
Pursuant to §6-3-2(e)(1), interpolation of the data for a process weight rate between 100 pounds per hour and sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

Therefore, when operating at a process weight rate of thirty hundredths (0.30) tons per hour (600 pounds of plywood per hour) the particulate matter (PM/PM10/PM2.5) from the woodworking facility shall not exceed one and eighty-three hundredths (1.83) pounds per hour.

Based on the calculations in Appendix A, the potential PM emission rate for the woodworking operations, after controls, is:

$0.08\ \text{ton/yr} \times (2000\ \text{lbs/ton} / 8760\ \text{hrs/yr}) = 0.02\ \text{lb/hr}$

The controlled PM emissions from the woodworking facility are 0.02 pounds of PM per hour, which is less than the allowable of one and eighty-three hundredths (1.83) pounds of PM/PM10/PM2.5 per hour. Therefore, the woodworking facility is in compliance with this rule.

The three (3) baghouses shall be in operation, and maintained according to manufacturer's specifications, at all times the woodworking facility is in operation, in order to comply with this limit.

Welding

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), particulate emissions from manufacturing processes, located anywhere in the state, unless specifically exempted by §6-3-1(b) shall follow the work practices and control technologies contained in §6-3-2, subsections (b) through (d), or be limited according to §6-3-2(e), as applicable.

Pursuant to §6-3-2(e)(1), interpolation of the data for a process weight rate between one hundred (100) pounds per hour and sixty thousand (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

Therefore, when operating at a process weight rate of eleven thousand six hundred sixty-six and twenty-three hundredths (11,666.23) pounds per hour, the particulate matter (PM) from the forty-two (42) Metal Inert Gas (MIG) welding stations shall be limited to thirteen and thirty-six hundredths (13.36) pounds of PM per hour.

Based on the calculations in Appendix A, the uncontrolled potential PM emission rate, is:

0.21 ton/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.048 lbs/hr
The controlled PM emissions from the forty-two (42) Metal Inert Gas (MIG) welding stations are forty-eight thousandths (0.048) of a pound of PM per hour, which is less than the allowable of thirteen and thirty-six hundredths (13.36) pounds of PM per hour. Therefore, the forty-two (42) Metal Inert Gas (MIG) welding stations are in compliance with this rule.

Natural Gas Combustion

(a) 326 IAC 4-2-2 (Incinerators)
Pursuant to 326 IAC 6-3-1(a), affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 still does not apply to the two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, and the requirements are not included in this renewal.

(b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
Pursuant to 326 IAC 6-2-1(a), particulate emissions from combustion of fuel for indirect heating from all facilities located in Lake, Porter, Marion, Boone, Hamilton, Hendricks, Johnson, Morgan, Shelby, and Hancock Counties, which were existing and in operation or which received permit to construct prior to September 21, 1983, shall be limited according to §6-2-2. The two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, are each not sources of indirect heating, as defined in 326 IAC 1-2-19 “Combustion for indirect heating”. Therefore, 326 IAC 6-2-2 still does not apply to the two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, and the requirements are not included in this renewal.

(c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), particulate emissions from manufacturing processes, located anywhere in the state, unless specifically exempted by §6-3-1(b) shall follow the work practices and control technologies contained in §6-3-2, subsections (b) through (d), or be limited according to §6-3-2(e), as applicable.

Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3.

The two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, each do not meet the definition of a "manufacturing process", and are therefore each exempt from the requirements of 326 IAC 6-3.

Consequently, 326 IAC 6-3 still does not apply to the two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, and the requirements are not included in this renewal.

(d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)
Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from each of the two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 still does not apply to the two (2) burners, three (3) drying ovens, forty-two (42) radiant heaters, and one (1) air make-up unit, and the requirements are not included in this renewal.

Compliance Determination, Monitoring, Testing, Recordkeeping, and Reporting Requirements

Compliance Determination

(a) The existing Paint Shop, consisting of two (2) spray booths, continues to have applicable compliance determination conditions as specified below:

Emission Unit/Control	Operating Parameters	Method
Paint Shop	VOC content	Preparing or obtaining the "as supplied" and "as applied" VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

(1) Confirmation of the VOC content of the coatings used in the Paint Shop, consisting of two (2) spray booths, is still required to render the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

(b) The three (3) baghouses used to control particulate in the woodworking facility, shall continue to be in operation and control emissions at all times that the woodworking facility is in operation.

Compliance Monitoring Requirements

(a) The existing woodworking facility continues to have applicable compliance monitoring conditions as specified below:

(1) Broken or Failed Bag Detection
The Permittee shall maintain the three (3) baghouses controlling particulate emissions, from the woodworking facility, according to the manufacturer's specifications, and replace broken or failed bags as needed.

(A) Paragraph (a) of the Broken or Failed Baghouse condition (D.1.3) has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.6 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

(B) Paragraph (b) of the Broken or Failed Bag Detection condition (D.1.8) has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

These monitoring conditions are still necessary because the three (3) baghouses controlling particulate emissions, from the woodworking facility, must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(b) There continue to be no specific compliance monitoring requirements for the two (2) trailer assembly facilities, powder coating operations, welding operations, and the natural gas combustion units.

Testing requirements

(a) There continue to be no specific testing requirements associated with the paint shop (consisting of two (2) spray booths), two (2) trailer assembly facilities, powder coating operations, welding operations, woodcutting operations, and the natural gas combustion units.

Recordkeeping and Reporting Requirements

(a) The Permittee shall maintain records of VOC content, usage and emissions in order demonstrate compliance with the VOC emission limits;

Air Quality Impacts from Minor Sources

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has determined that a modeling analysis of the Unlimited Potential to Emit (PTE) criteria pollutants from this existing source is unnecessary to estimate whether the Limited PTE criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS), since they do not exceed the PSD Significant Emission Rate thresholds.

Conclusion and Recommendation

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 August 28, 2008.

The construction and operation of this stationary cargo trailer manufacturing source shall be subject to the conditions of the attached MSOP Renewal No. 039-26925-00431. The staff recommends to the Commissioner that this MSOP Renewal be approved.

IDEM Contact

Questions regarding this proposed permit can be directed to Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emissions Calculations
Emission Summary

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Uncontrolled Potential Emissions (tons/year)

		Emissions Generating Activity								
		Surface Coating Operations				Woodworking	Welding	Combustion		
		Paint	Powder Coating	Trailer Assembly						
Category	Pollutant	Shop	Booth	Plant 1	Plant 2	Facility		Plant 1	Plant 2	**TOTAL**
Criteria	PM	14.05	7.67	0.79	0.79	0.08	0.21	0.08	0.15	23.83
Pollutants	PM10	14.05	7.67	0.79	0.79	0.08	0.21	0.31	0.62	24.53
	PM2.5	14.05	7.67	0.79	0.79	0.08	0.21	0.23	0.46	24.30
	SO2	0	0	0	0	0	0	0.02	0.05	0.07
	NOx	0	0	0	0	0	0	4.08	8.15	12.23
	VOC	7.81	0	2.36	2.36	0	0	0.22	0.45	13.20
	CO	0	0	0	0	0	0	3.43	6.84	10.27
Hazardous	Benzene	0	0	0	0	0	0	8.57E-05	1.71E-04	2.57E-04
Air	Dichlorobenzene	0	0	0	0	0	0	4.90E-05	9.78E-05	1.47E-04
Pollutants	Ethylbenzene	2.43	0	0	0	0	0	0	0	2.43
	Formaldehyde	0	0	0	0	0	0	3.06E-03	6.11E-03	0.01
	Hexane	0	0	0.67	0.67	0	0	0.07	0.15	1.55
	Methylene Chloride	0	0	0.71	0	0	0	0	0	0.71
	Tetrachloroethylene	0	0	0.32	0.32	0	0	0	0	0.64
	Trichloroethane	0	0	0.94	0	0	0	0	0	0.94
	Trichloroethylene	0	0	0	1.96	0	0	0	0	1.96
	Toluene	4.86	0	0.82	0.82	0	0	1.39E-04	2.77E-04	6.51
	Xylene	4.86	0	0	0	0	0	0	0	4.86
	Cadmium	0	0	0	0	0	0	4.49E-05	8.96E-05	1.35E-04
	Chromium	0	0	0	0	0	4.12E-04	5.72E-05	1.14E-04	5.83E-04
	Lead	0	0	0	0	0	0	2.04E-05	4.07E-05	6.11E-05
	Manganese	0	0	0	0	0	0.13	1.55E-05	3.10E-05	0.13
	Nickel	0	0	0	0	0	4.12E-04	8.57E-05	1.71E-04	6.69E-04
	Totals	**12.15**	**0**	**3.46**	**3.77**	**0**	**0.13**	**0.08**	**0.15**	**19.74**
									"Worst Case" Single HAP =	**6.51**

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

		Emissions Generating Activity								
		Surface Coating Operations				Woodworking	Welding	Combustion		
		Paint	Powder Coating	Trailer Assembly						
Category	Pollutant	Shop	Booth	Plant 1	Plant 2			Plant 1	Plant 2	**TOTAL**
Criteria	PM	0.70	0.38	0.79	0.79	0.08	0.21	0.08	0.15	3.20
Pollutants	PM10	0.70	0.38	0.79	0.79	0.08	0.21	0.31	0.62	3.90
	PM2.5	0.70	0.38	0.79	0.79	0.08	0.21	0.23	0.46	3.67
	SO2	0	0	0	0	0	0	0.02	0.05	0.07
	NOx	0	0	0	0	0	0	4.08	8.15	12.23
	VOC	7.81	0	2.36	2.36	0	0	0.22	0.45	13.20
	CO	0	0	0	0	0	0	3.43	6.84	10.27
Hazardous	Benzene	0	0	0	0	0	0	8.57E-05	1.71E-04	2.57E-04
Air	Dichlorobenzene	0	0	0	0	0	0	4.90E-05	9.78E-05	1.47E-04
Pollutants	Ethylbenzene	2.43	0	0	0	0	0	0	0	2.43
	Formaldehyde	0	0	0	0	0	0	3.06E-03	6.11E-03	0.01
	Hexane	0	0	0.67	0.67	0	0	0.07	0.15	1.55
	Methylene Chloride	0	0	0.71	0	0	0	0	0	0.71
	Tetrachloroethylene	0	0	0.32	0.32	0	0	0	0	0.64
	Trichloroethane	0	0	0.94	0	0	0	0	0	0.94
	Trichloroethylene	0	0	0	1.96	0	0	0	0	1.96
	Toluene	4.86	0	0.82	0.82	0	0	1.39E-04	2.77E-04	6.51
	Xylene	4.86	0	0	0	0	0	0	0	4.86
	Cadmium	0	0	0	0	0	0	4.49E-05	8.96E-05	1.35E-04
	Chromium	0	0	0	0	0	4.12E-04	5.72E-05	1.14E-04	5.83E-04
	Lead	0	0	0	0	0	0	2.04E-05	4.07E-05	6.11E-05
	Manganese	0	0	0	0	0	0.13	1.55E-05	3.10E-05	0.13
	Nickel	0	0	0	0	0	4.12E-04	8.57E-05	1.71E-04	6.69E-04
	Totals	**12.15**	**0**	**3.46**	**3.77**	**0**	**0.13**	**0.08**	**0.15**	**19.74**
									"Worse Case" Single HAP =	**6.51**

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Particulate (PM/PM10/PM2.5) and
Volitile Organic Compound (VOC) Emissions
From One (1) Paint Shop and Two (2) Trailer Assembly Units (Flaw Repair)

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hour)	* Actual VOC (lb/day)	Potential VOC (lbs/day)	** Actual VOC (ton/yr)	Potential VOC (tonsyear)	*** Potential PM/PM10/PM2.5 (lbs/hour)	*** Potential PM/PM10/PM2.5 (ton/year)	**** Transfer Efficiency
One (1) Paint Shop, consisting of two (2) Spray Booths																		
ZPG-20060	11.50	20.0%	0.0%	20.0%	0.0%	62.0%	0.100	7.75	2.30	2.30	1.78	14.3	42.8	2.60	7.81	3.21	14.1	55%
Toluene	7.25	100%	0.0%	100%	0.0%	0.0%	0.010	7.75	7.25	7.25	0.56	4.50	13.49	0.82	2.46	0.00	0.00	55%
90-907 Black Enamel	8.42	74.6%	60.6%	14.0%	61.3%	22.3%	0.170	7.75	3.05	1.18	1.55	12.42	37.27	2.27	6.80	1.27	5.55	55%
												31.18		2.60	**7.81**		**14.05**	
																Control Efficiency	**95.00%**	
															Controlled Emissions =		**0.70**	
Trailer Assembly - Plant 1 (Flaw Repair)																		
Caulking	9.93	4.00%	0.0%	4.0%	0.0%	95.0%	0.001	7.75	0.00	0.40	0.00	0.02	0.07	0.00	0.01	0.00	0.00	100%
Cyclo Adhesive	5.60	83.0%	0.0%	83.0%	0.0%	17.0%	0.010	7.75	4.65	4.65	0.36	2.88	8.65	0.53	1.58	0.00	0.00	100%
Cyclo Brake Cleaner	12.00	100%	0.0%	100.0%	0.0%	0.0%	0.005	7.75	12.0	12.0	0.47	3.72	11.16	0.68	2.04	0.00	0.00	55%
Cyclo 33	5.92	91.8%	0.0%	91.8%	0.0%	0.0%	0.002	7.75	5.43	5.43	0.08	0.67	2.0	0.1	0.37	0.00	0.01	55%
Cyclo 35	9.34	57.3%	0.0%	57.3%	61.3%	43.0%	0.013	7.75	13.8	5.35	0.54	4.31	12.9	0.8	2.36	0.18	0.79	55%
Sealant	13.03	33.0%	0.0%	33.0%	0.0%	57.0%	0.004	7.75	4.30	4.30	0.13	1.07	3.20	0.19	0.58	0.12	0.53	55%
											1.58	12.68		0.79	**2.36**		**0.79**	
Trailer Assembly - Plant 2 (Flaw Repair)																		
Caulking	9.93	4.0%	0.0%	4.0%	0.0%	95.0%	0.001	7.75	0.40	0.40	0.00	0.02	0.07	0.00	0.01	0.00	0.00	100%
Cyclo Adhesive	5.60	83.0%	0.0%	83.0%	0.0%	17.0%	0.010	7.75	4.65	4.65	0.36	2.88	8.65	0.53	1.58	0.00	0.00	100%
063-Sprayway Solvent Cleaner & Degreaser	12.14	100.0%	0.0%	100.0%	0.0%	0.0%	0.005	7.75	12.14	12.14	0.47	3.76	11.29	0.69	2.06	0.00	0.00	100%
Cyclo 33	5.92	91.8%	0.0%	91.8%	0.0%	0.0%	0.002	7.75	5.43	5.43	0.08	0.67	2.02	0.12	0.37	0.00	0.01	55%
Cyclo 35	9.34	57.3%	0.0%	57.3%	61.3%	43.0%	0.013	7.75	13.8	5.35	0.54	4.31	12.94	0.79	2.36	0.18	0.79	55%
Sealant	13.00	33.0%	0.0%	33.0%	0.0%	57.0%	0.004	7.75	4.29	4.29	0.13	1.06	3.19	0.19	0.58	0.12	0.53	55%
												12.72		0.79	**2.36**		**0.79**	
															Uncontrolled Potential Emissions =	**12.53**	**15.64**	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC/Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour)
PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour) * 24 hours/day
PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (lbs/hour) = Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %)
*Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) *8hrs
**Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (2920 hr/yr) * (1 ton/2000 lbs)

NOTES

* Actual operating hours = 8 hours/day
*** PM, PM10, and PM 2.5 emissions are assumed equal.
**** Coatings are applied using HVLP guns, except for sealant and caulking applications, which are applied using a putty knife. All units are controlled by dry filters.

Appendix A: Emissions Calculations
Hazardous Air Pollutant (HAP) Emissions
From One (1) Paint Shop and Two (2) Trailer Assembly Units (Flaw Repair)

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

													POTENTIAL EMISSIONS (TONS/YEAR)								
Material	Density (lb/gal)	Max Usage (gal/unit)	Max. Throughput (unit/hour)	Weight % Toulene	Weight % Ethylbenzene	Weight % Methylene Chloride	Weight % Tetrachloroethylene	Weight % Trichloroethane	Weight % Trichloroethylene	Weight % Perchloroethylene	Weight % Hexane	Weight % Xylene	Toluene	Ethylbenzene	Methylene Chloride	Tetrachloroethylene	Trichloroethane	Trichloroethylene	Perchloroethylene	Hexane	Xylene
One (1) Paint Shop, consisting of two (2) Spray Booths																					
ZPG-20060	11.5	0.100	7.75	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Toluene	7.25	0.010	7.75	100.0%	---	---	---	---	---	---	---	---	2.46	---	---	---	---	---	---	---	---
90-907 Black Enamel	8.42	0.170	7.75	10.0%	5.0%	---	---	---	---	---	---	10.0%	4.86	2.43	---	---	---	---	---	---	4.86
													4.86	**2.43**	**0**	**0**	**0**	**0**	**0**	**0**	**4.86**
Trailer Assembly - Plant 1 (Flaw Repair)																					
Caulking	9.93	0.001	7.75	---	---	---	95.0%	---	---	---	---	---	---	---	---	0.32	---	---	---	---	---
Cyclo Adhesive	5.60	0.010	7.75	---	---	---	---	---	---	---	35.0%	---	---	---	---	---	---	---	---	0.67	---
Cyclo Brake Cleaner	12.0	0.005	7.75	---	---	35.0%	---	46.0%	---	24.1%	---	---	---	---	0.71	---	0.94	---	0.49	---	---
Cyclo 33	5.92	0.002	7.75	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Cyclo 35	9.34	0.013	7.75	20.0%	---	---	---	---	---	---	---	---	0.82	---	---	---	---	---	---	---	---
Sealant	13.0	0.004	7.75	3.0%	---	---	---	---	---	---	---	---	0.05	---	---	---	---	---	---	---	---
													0.82	**0**	**0.71**	**0.32**	**0.94**	**0**	**0.49**	**0.67**	**0.00**
Trailer Assembly - Plant 2 (Flaw Repair)																					
Caulking	9.93	0.001	7.75	---	---	---	95.0%	---	---	---	---	---	---	---	---	0.32	---	---	---	---	---
Cyclo Adhesive	5.60	0.010	7.75	---	---	---	---	---	---	---	35.0%	---	---	---	---	---	---	---	---	0.67	---
063-Sprayway Solvent Cleaner & Degreaser	12.14	0.005	7.75	---	---	---	---	---	95.0%	---	---	---	---	---	---	---	---	1.96	---	---	---
Cyclo 33	5.92	0.002	7.75	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Cyclo 35	9.34	0.013	7.75	20.0%	---	---	---	---	---	---	---	---	0.82	---	---	---	---	---	---	---	---
Sealant	13.00	0.004	7.75	3.0%	---	---	---	---	---	---	---	---	0.05	---	---	---	---	---	---	---	---
													0.82	**0**	**0**	**0.32**	**0**	**1.96**	**0**	**0.67**	**0.00**
												Uncontrolled Potential Emissions =	**6.51**	**2.43**	**0.71**	**0.64**	**0.94**	**1.96**	**0.49**	**1.33**	**4.86**

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

Total HAPs: 19.87 tons/yr

Appendix A: Emissions Calculations
Particulate (PM/PM10/PM2.5) Emissions
From One (1) Powder Coating Line

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Unit	Max. Throughput Rate (lbs/hour)	Weight % Solids	Transfer Efficiency (%)	*PTE of PM/PM10/PM2.5 (tons/year)
Powder Coating Booth	5.00	100%	65%	7.67

Uncontrolled =	**7.67**
Control Efficiency =	**95%**
Controlled =	**0.38**

Controlled (lbs/hr) =	**0.088**

METHODOLOGY

Uncontrolled PTE PM/PM10/PM2.5 (tons/year) = Max. Throughput Rate (lb/hour) * Weight % Solids * 8760 hours/year * 1 ton/2000 lbs * (1- Transfer Efficiency %)
Controlled Emissions (tons/yr) = Uncontrolled PTE PM/PM10/PM2.5 (tons/year) * (1- Control Efficiency)
Controlled Emissions (lbs/hr) = Controlled Emissions (tons/yr) * (2000 lbs/ton / 8760 hrs/yr)

NOTES

PTE = Potential to Emit
* PM, PM10, and PM 2.5 emissions are assumed equal.
Control efficiency assumed to be 95%

326 IAC 6-3-2(e) Allowable Rate of Emissions

Pursuant to § 6-3-2(e), when the process weight rate is less than one hundred (100) pounds per hour, the particulate matter (PM) emissions from the powder coating operations shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

The PM emissions from the powder coating operations, after controls, are **0.088** pounds of PM per hour, which is less than the allowable of 0.551 pounds of PM per hour. Therefore, the powder coating operations are in compliance with this rule.

The dry filters shall be in operation and maintained according to manufacturer's specifications, at all times the powder coating equipment is in operation, in order to comply with this limit.

Appendix A: Emission Calculations
Particulate (PM/PM10/PM2.5) Emissions
From the Woodworking Facility

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Potential to Emit (PTE)

Emission Unit	* Dust Collected Per Line (lbs/hour)	Number of Lines	**PTE of PM/PM10/PM2.5 (lbs/hour)	(tons/year)
Woodworking	0.63	3	**0.02**	0.08
			Total Controlled Emissions =	0.08

METHODOLOGY
PTE PM/PM10 (lbs/hour) = [(Dust collected (lbs/unit) x Number of lines) / (control efficiency)] x (1- control efficiency)
PTE PM/PM10 (tons/year) = (PTE PM/PM10 (lbs/hour))*8760)/2000

NOTES
Potential emissions for particulate matter (PTE) were calculated after consideration of the controls. (See pages 2 & 3 of 17, in the TSD for further clarification)

*PTE calculated using amount of dust collected.
> The source collects 5 pounds of dust per 8 hr day per line.
> Control devices include; three (3) baghouses, one per line, with 99 % efficiency, each.
** PM, PM10, and PM 2.5 emissions are assumed equal.

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	*** Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Woodworking	600	0.30	**1.83**	8.02

Methodology
***Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).
Allowable Emissions (lb/hr) = 4.10(Process Weight Rate (lb/hr)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Appendix A: Emission Calculations
Particulate (PM/PM10/PM2.5) and Hazardous Air Pollutants (HAPs)
Welding Operations

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Process (MIG WELDING)	Number of Stations	Max. Electrode Consumption (lbs/hr)	*Emission Factors (lb pollutant/lb electrode)				Potential To Emit (lbs/hour)			
			PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr
NS-101-705-3	17	1.20	5.2E-03	3.2E-03	1.0E-05	1.0E-05	0.11	0.06	2.04E-04	2.04E-04
NS-101-705-4	25	0.833	5.2E-03	3.2E-03	1.0E-05	1.0E-05	0.11	0.07	2.08E-04	2.08E-04

PTE of PM/PM10/PM2.5 (tons/year) = 0.21
PTE of HAPs (tons/year) = 0.13

METHODOLOGY
PTE (lbs/hour) = No. of Stations * Max. Electrode Consumption (lbs/hour) * Emission Factor (lbs pollutant/lbs electrode)
PTE (tons/year) = No. of Stations * Max. Electrode Consumption (lbs/hour) * Emission Factor (lbs pollutant/lbs electrode) * 8760 hours/year * 1 ton/2000 lbs

NOTES
PTE = Potential to Emit
*Emission factors are from AP-42, Chapter 12.19, Tables 12.19-1, and 12.19-2 SCC 3-09-050
MIG = Metal Inert Gas MIG Welding
PM, PM10, and PM 2.5 emissions are assumed equal.

Maximum electrode consumption per day

PROCESS (MIG WELDING)	Number of Stations	Maximum electrode consumption (lbs/hr)	Combined maximum electrode consumption (lbs/hr)	Combined maximum electrode consumption (lbs/day)
NS-101-705-3	17	1.20	20.40	489.60
NS-101-705-4	25	0.83	20.83	499.80
	Total	2.03	**41.23**	**989.40**

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	**Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Welding	11,666	5.83	**13.36**	58.53

Methodology
Combined maximum electrode consumption (lbs/hr) = Number of Stations * Maximum electrode consumption per station (lb/hr)
Combined maximum electrode consumption (lbs/day) = Combined maximum electrode consumption (lbs/hr) * 24 hrs/day

**Process weight; weight rate: The total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).
Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Appendix A: Emission Calculations
Natural Gas Combustion Only - Plant 1
Forty-two (42) Radiant Heaters and One (1) Air Make-up Unit

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Total Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
9.32 (43 units total)	81.6

	Pollutant						
	* PM	* PM10	PM2.5*	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	5.7	0.6	100	5.5	84
Potential To Emit (tons/year)	0.08	0.31	0.23	0.02	4.08	0.22	3.43

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.
**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	8.57E-05	4.90E-05	3.06E-03	0.07	1.39E-04

	HAPs - Metals				
	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	2.04E-05	4.49E-05	5.72E-05	1.55E-05	8.57E-05

The five highest organic and metal HAPs emission factors as 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.

"Worst" Single HAP =	**0.07**	**tons/yr**
Total Combined HAPs =	**0.08**	**tons/yr**

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors 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).

0
Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu 0
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs 0

Appendix A: Emission Calculations
Natural Gas Combustion Only - Plant 2
Two (2) Burners, Three (3) Drying Ovens

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Total Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
18.6 (5 Units Only)	163

	Pollutant						
	* PM	* PM10	PM2.5*	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	5.7	0.6	100	5.5	84
Potential To Emit (tons/year)	0.15	0.62	0.46	0.05	8.15	0.45	6.84

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.
**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.71E-04	9.78E-05	6.11E-03	0.15	2.77E-04

	HAPs - Metals				
	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	4.07E-05	8.96E-05	1.14E-04	3.10E-05	1.71E-04

The five highest organic and metal HAPs emission factors as 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.

"Worst" Single HAP =	**0.15**	**tons/yr**
Total Combined HAPs =	**0.15**	**tons/yr**

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors 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).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

Appendix A: Emissions Calculations
PSD Significant Emission Rate Modeling Test

Company Name: Forest River, Inc. - U.S. Cargo Division
Address: 17645 Commerce Drive, Bristol, Indiana 46507
MSOP Renewal No.: 039-26925-00431
Reviewer: Hannah L. Desrosiers
Date Submitted: August 28, 2008

Entire Source	PM10	SO2	Nox	Co	Pb
Controlled Emissions (Tons/yr)	3.90	0.07	12.23	10.27	6.11E-05
Controlled Emissions Rate (lbs/hr)	0.89	0.02	2.79	2.35	1.40E-05
PSD Significant threshold (lbs/hr)	**3.42**	**9.13**	**9.13**	**22.83**	**0.137**
Threshold exceeded?	No	No	No	No	No