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: December 22, 2008

RE: Forest River Inc. Cargo Mate Division / 039-27057-00510

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. Cargo Mate Division
3731 California Street
Elkhart, Indiana 46514

(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.: M039-27057-00510	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 22, 2008 Expiration Date: December 22, 2018

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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 plant..

Source Address:	3731 California Street, Elkhart, IN 46514
Mailing Address:	P.O. 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) Assembly Operation, constructed after 1999, with various coatings applied using aerosol cans, manual tube extrusion guns, and other methods for the coating of metal surfaces of cargo trailers with a maximum capacity of manufacturing 1.3095 trailers per hour; exhausting within the building.

(b) One (1) Painting Operation, constructed after 1999, using two (2) high volume low pressure (HVLP) guns for the coating of metal surfaces of cargo trailers with a maximum capacity of 1.3095 trailers per hour, utilizing fabric filters for particulate control; exhausting through a stack.

(c) One (1) Woodworking Operation, constructed after 1999, consisting of five (5) table saws and five (5) radial arm saws, with a combined maximum capacity of 2,280 pounds per hour (lb/hr), utilizing Jet Vac dust collectors as particulate control, and exhausting within the building.

(d) One (1) Welding Operation, constructed after 1999, consisting of seven (7) metal inert gas (MIG) welding stations nominally rated for a maximum capacity of 0.18 pounds RE 70S electrode per hour each.

(e) Nine (9) natural gas-fired space heaters, with a combined nominal capacity of 8.50 million British thermal units per hour (mmBtu/hr), each exhausting through separate stacks.

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, M039-27057-00510, 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 M039-27057-00510 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 demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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.

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 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.14 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.15 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.16 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 Unit Description:

(a) One (1) Assembly Operation, constructed after 1999, with various coatings applied using aerosol cans, manual tube extrusion guns, and other methods for the coating of metal surfaces of cargo trailers with a maximum capacity of manufacturing 1.3095 trailers per hour; exhausting within the building.

(b) One (1) Painting Operation, constructed after 1999, using two (2) high volume low pressure (HVLP) guns for the coating of metal surfaces of cargo trailers with a maximum capacity of 1.3095 trailers per hour, utilizing fabric filters for particulate control; exhausting through a stack.

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

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

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

Pursuant to 326 IAC 8-2-9, when coating metal, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

D.1.3 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM from the assembly operations, when using 92-0117 Rollie Williams Flat Black, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Pursuant to 326 IAC 6-3-2(d), particulate from the painting operations shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer¡s) specifications.

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

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

Operate equipment so that no overspray is visibly detectable at the exhaust or

accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) Assembly Operations and the one (1) Painting Operations, and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)(7)]

(a) Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) by preparing or obtaining from the manufacturer the copies of the as supplied and as applied VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The daily volume weighted average of VOC content shall be calculated using the following methodology:

Where:

$$A = \frac{C \times U}{U} \leq 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon, as applied
C = As-applied VOC content of coating in pounds VOC per gallon
U = Usage rate of coating in gallons per day

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water;

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content;

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

(2) The volume weighted VOC content less water of the non-compliant coatings used for each day.

The volume weighted VOC content does not have to be calculated or recorded on those days when only compliant coatings are used.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the painting operations stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) One (1) Woodworking Operation, constructed after 1999, consisting of five (5) table saws and five (5) radial arm saws, with a combined maximum capacity of 2,280 pounds per hour (lb/hr), utilizing Jet Vac dust collectors as particulate control, and exhausting within the building.

(d) One (1) Welding Operation, constructed after 1999, consisting of seven (7) metal inert gas (MIG) welding stations nominally rated for a maximum capacity of 0.18 pounds RE 70S electrode per hour each.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking operation shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,280 pounds per hour.

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

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) woodworking operation, and its control devices.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The Jet Vac dust collector system shall be in operation and control emissions from the woodworking operations at all times the emission units are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Forest River, Inc. Cargo Mate Division
Source Address: 3731 California Street, Elkhart, Indiana 46514
Mailing Address: P.O. Box 3030, Elkhart, IN 46514
MSOP No.: M039-27057-00510

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. Cargo Mate Division
Address:	3731 California Street
City:	Elkhart, Indiana 46514
Phone #:	(574) 534-6913
MSOP #:	M039-27057-00510

I hereby certify that Forest River, Inc. Cargo Mate Division :
☐ still in operation.
☐ no longer in operation.

I hereby certify that Forest River, Inc. Cargo Mate Division :
☐ in compliance with the requirements of MSOP M039-27057-00510.
☐ not in compliance with the requirements of MSOP M039-27057-00510.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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:

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a MSOP Renewal

Source Background and Description

Source Name:	**Forest River, Inc. Cargo Mate Division**
Source Location:	**3731 California Street, Elkhart, IN 46514**
County:	**Elkhart**
SIC Code:	**3799**
Operation Permit No.:	**M039-27057-00510**
Permit Reviewer:	**Jason R. Krawczyk**

On November 18, 2008, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Forest River, Inc. Cargo Mate Division had applied for a MSOP Renewal 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.

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**.

...

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the ~~DC-3~~ stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

IDEM Contact

(a) Questions regarding this proposed MSOP Renewal can be directed to Jason R. Krawczyk 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) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.

(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 Renewal

Source Description and Location

Source Name:	**Forest River, Inc. Cargo Mate Division**
Source Location:	**3731 California Street, Elkhart, IN 46514**
County:	**Elkhart**
SIC Code:	**3799**
Permit Renewal No.:	**039-27057-00510**
Permit Reviewer:	**Jason R. Krawczyk**

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

Background and Description of Permitted Emission Units

On October 1, 2008, Forest River, Inc. Cargo Mate Division submitted an application to the OAQ requesting to renew its operating permit. Forest River, Inc. Cargo Mate Division was issued MSOP 039-18051-000510 on June 22, 2004.

The source consists of the following permitted emission unit(s):

(a) One (1) Assembly Operation, constructed after 1999, with various coatings applied using aerosol cans, manual tube extrusion guns, and other methods for the coating of metal surfaces of cargo trailers with a maximum capacity of manufacturing 1.3095 trailers per hour; exhausting within the building.

(b) One (1) Painting Operation, constructed after 1999, using two (2) high volume low pressure (HVLP) guns for the coating of metal surfaces of cargo trailers with a maximum capacity of 1.3095 trailers per hour, utilizing fabric filters for particulate control; exhausting through a stack.

(c) One (1) Woodworking Operation, constructed after 1999, consisting of five (5) table saws and five (5) radial arm saws, with a combined maximum capacity of 2,280 pounds per hour (lb/hr), utilizing Jet Vac dust collectors as particulate control, and exhausting within the building.

(d) One (1) Welding Operation, constructed after 1999, consisting of seven (7) metal inert gas (MIG) welding stations nominally rated for a maximum capacity of 0.18 pounds RE 70S electrode per hour each.

(e) Nine (9) natural gas-fired space heaters, with a combined nominal capacity of 8.50 million British thermal units per hour (mmBtu/hr), each exhausting through separate stacks.

Unpermitted Emission Units and Pollution Control Equipment

There have been no unpermitted emission units constructed and/or operated without a permit at the source since the last approval.

Emission Units and Pollution Control Equipment Removed From the Source

There have been no emission units or pollution control equipment removed from the source since the last approval.

Existing Approvals

Since the issuance of the MSOP 039-18051-00510 on June 22, 2004, the source has constructed or has been operating under no other approvals.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this MSOP Renewal:

(a) Pursuant to 326 IAC 6-3-1(b)(9) welding operations consuming less than six hundred twenty-five (625) pounds of rod wire per day are exempt from particulate emissions limitations. Therefore, the following requirement has been removed from the permit:

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding operations shall not exceed 14.20 pounds per hour, respectively, when operating at a process weight rate of 6386.0 pounds per hour.

Enforcement Issues

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County

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 twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	Less than 25
PM_{10}	Less than 25
$PM_{2.5}$	Less than 25
SO_2	Less than 25
VOC	Greater than 25, Less than 100
CO	Less than 25
NO_x	Less than 25

HAPs	tons/year
Single	Less than 10
Combined	Less than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is still less than 100 tons per year, but greater than twenty-five (25) tons per year for VOC. The

source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(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.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit because the source is not a major source of HAPs as defined in 40 CFR 63.2.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (326 IAC 20-80), are not included in the permit because the source does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), and does not do any spray application of coatings to motor vehicles or motor vehicle equipment.

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

Compliance Assurance Monitoring (CAM)

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is 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 Determination

The following state rules are applicable to the entire source:

(a) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

b) 326 IAC 2-4.1 (New Source Toxics Control)
The operation of the source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

(c) 326 IAC 2-6 (Emission Reporting)
This source is located in Elkhart County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

(d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall 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.

(e) 326 IAC 6-4 (Fugitive Dust Emissions)
Pursuant to 326 IAC 6-4, fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

<u>Assembly Operations</u>

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

(1) The following coatings are applied by extrusion, roll coating, brushing, or wiping: Westech WT-HSC13 Contact Adhesive, Isopropyl Alcohol, Oatey ABS Cleaner, Oatey ABS Cement, Cyclo C192 Max Clean, Evercoat Lite Weight Bodyfiller, CP 100 Touch N Seal Black Gun Foam, S-M 6104 Roof Sealant, and Tac Bond E900 Tile Adhesive. These application methods do not cause particulate emissions, and are exempt from the requirements of 326 IAC 6-3-2 pursuant to 326 IAC 6-3-1(b).

(2) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM from the assembly operations, when using coatings which are not exempt in (f)(1) above, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(g) 326 IAC 8-2-9 (Volatile Organic Compounds)
The Assembly Operations are subject to 326 IAC 8-2-9 because the actual VOC emissions are greater than 15 lb/day and the facility was constructed after 1990.

(1) Pursuant to 326 IAC 8-2-9, when coating metal, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(a) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) by preparing or obtaining from the

manufacturer the copies of the as supplied and as applied VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The daily volume weighted average of VOC content shall be calculated using the following methodology:

Where:

$$A = \frac{C \times U}{U} \leq 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon, as applied
C = As-applied VOC content of coating in pounds VOC per gallon
U = Usage rate of coating in gallons per day

Based on calculations, Forest River, Inc. Cargo Mate Division is able to comply with the VOC usage limitations.

(2) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the Painting Operation 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.

Painting Operations

(h) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the painting operations shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer¡s) specifications.

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

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

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

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(i) 326 IAC 8-2-9 (Volatile Organic Compounds)
The Painting Operations are subject to 326 IAC 8-2-9 because the actual VOC emissions are greater than 15 lb/day and the facility was constructed after 1990.

(1) Pursuant to 326 IAC 8-2-9, when coating metal, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(a) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) by preparing or obtaining from the manufacturer the copies of the as supplied and as applied VOC data sheets.

IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The daily volume weighted average of VOC content shall be calculated using the following methodology:

Where:

$$A = \frac{C \times U}{U} \leq 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon, as applied
C = As-applied VOC content of coating in pounds VOC per gallon
U = Usage rate of coating in gallons per day

Based on calculations, Forest River, Inc. Cargo Mate Division is able to comply with the VOC usage limitations.

(2) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the Painting Operation 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.

Woodworking Operations

(j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the (1) woodworking operation shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,280 pounds per hour. The pounds per hour limitation was calculated using the following equation:

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

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

The potential emissions from the woodworking operation, before controls, are 3.42 pounds per hour. Therefore, the woodworking operation is in compliance with this limit without requiring that the portable Jet Vac dust collectors be operated at all times when the woodworking operation is in operation.

Welding Operations

(k) 326 IAC 6-3 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-1(a)(9) the gas metal arc welding station, identified as SM-02, is exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

Compliance Determination Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/ Control	Parameter	Frequency	Provisions	Excursions and Exceedances
Painting Operations	Filter Particulate Loading	Daily		Response Steps
	Stack Overspray Emissions	Weekly		Response Steps
	Rooftop / Ground Coating & Overspray Emissions	Monthly		Response Steps

(b) There are no testing requirements applicable to this source.

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 October 1, 2008.

The operation of this source shall be subject to the conditions of the attached proposed MSOP Renewal No. 039-27057-00510. The staff recommends to the Commissioner that this MSOP Renewal be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.

(b) A copy of the findings 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

SUMMARY OF EMISSIONS

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Uncontrolled Emissions (Tons/Yr)						
Pollutant	Combustion	Assembly Operations	Painting Operations	Woodworking*	Welding	Total PTE
PM	0.07	2.51	13.58	0.75	0.03	16.94
PM10	0.28	2.51	13.58	0.14	0.03	16.54
PM2.5	0.28	2.51	13.58	0.14	0.03	16.54
VOC	0.20	11.74	24.16	-	-	36.10
NOx	3.72	-	-	-	-	3.72
SO2	1.06	-	-	-	-	1.06
CO	3.13	-	-	-	-	3.13
Single HAP (Toluene)	-	0.22	9.42	-	-	9.64
Combined HAPs	0.07	0.92	14.91	-	0.00	15.91

Controlled Emissions (Tons/Yr)						
Pollutant	Combustion	Assembly Operations	Painting Operations	Woodworking*	Welding	Total PTE
PM	0.07	2.51	0.68	0.75	0.03	4.04
PM10	0.28	2.51	0.68	0.14	0.03	3.64
PM2.5	0.28	2.51	0.68	0.14	0.03	3.64
VOC	0.20	11.74	24.16	-	-	36.10
NOx	3.72	-	-	-	-	3.72
SO2	1.06	-	-	-	-	1.06
CO	3.13	-	-	-	-	3.13
Single HAP (Toluene)	-	0.22	9.42	-	-	9.64
Combined HAPs	0.07	0.92	14.91	-	0.00	15.91

* Please see Page 8 of TSD App A for explanation on woodworking operations potential to emit.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Forest River, Inc. Cargo Mate Division**
Address City IN Zip: **3731 California Street, Elkhart, IN 46514**
Permit Number: **039-27057-00510**
Plt ID: **039-00510**
Reviewer: **Jason R. Krawczyk**
Date: **October 21, 2008**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.5	74.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	28.5	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.3	1.1	3.7	0.2	3.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.818E-05	4.468E-05	2.792E-03	6.701E-02	1.266E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.862E-05	4.095E-05	5.212E-05	1.415E-05	7.818E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate
From Assembly Operations

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
92-0117 Rollie Williams Flat Black	11.24	47.02%	30.27%	16.8%	48.44%	52.98%	0.17000	1.310	3.65	1.88	0.42	10.06	1.84	1.45	3.55	75%
Rollie Williams AquaGlo 333 White	10.70	66.00%	38.40%	27.6%	38.40%	34.00%	0.00029	1.310	4.79	2.95	0.00	0.03	0.00	0.00	8.69	75%
Cyclo C112 Brake/Parts Cleaner	12.25	100.00%	75.00%	25.0%	75.00%	0.00%	0.00065	1.310	12.25	3.06	0.00	0.06	0.01	0.00	N/A	75%
Cyclo C33 Silicone Spray	5.59	91.75%	31.75%	60.0%	32.76%	0.00%	0.00260	1.310	4.99	3.35	0.01	0.27	0.05	0.00	N/A	75%
Cyclo C35 Undercoating	9.33	100.00%	42.75%	57.3%	42.75%	0.00%	0.01300	1.310	9.33	5.34	0.09	2.18	0.40	0.00	N/A	75%
Cyclo C900 Spray Adhensive	5.60	83.00%	11.00%	72.0%	11.00%	17.00%	0.00520	1.310	4.53	4.03	0.03	0.66	0.12	0.01	23.72	75%
Accumetric Boss 380 RTV Silicone (BDR)	8.66	5.20%	0.00%	5.2%	0.00%	94.80%	0.19000	1.310	0.45	0.45	0.11	2.69	0.49	0.00	0.48	100%
Westech WT-HSC13 Contact Adhensive	6.66	9.40%	0.00%	9.4%	0.00%	0.00%	0.08680	1.310	0.63	0.63	0.07	1.71	0.31	0.75	N/A	75%
Alumilastic SC0270 124 (H.B. Fuller)	13.47	4.50%	0.00%	4.5%	0.00%	95.50%	0.01390	1.310	0.61	0.61	0.01	0.26	0.05	0.00	0.63	100%
Seymour 11056 Chrome Aluminum	6.33	77.10%	0.00%	77.1%	0.00%	22.90%	0.00455	1.310	4.88	4.88	0.03	0.70	0.13	0.01	21.31	75%
Seymour MRO Flat Black	7.50	69.70%	21.15%	48.6%	21.15%	29.30%	0.01300	1.310	4.62	3.64	0.06	1.49	0.27	0.04	12.43	75%
Seymour 11054 Red Oxide Primer	7.50	77.70%	25.12%	52.6%	25.12%	21.80%	0.00130	1.310	5.27	3.94	0.01	0.16	0.03	0.00	18.09	75%
Isopropyl Alcohol	6.70	100.00%	0.00%	100.0%	0.00%	0.00%	0.12100	1.310	6.70	6.70	1.06	25.48	4.65	0.00	N/A	100%
WD40	6.80	69.70%	0.00%	69.7%	0.00%	30.00%	0.06000	1.310	4.74	4.74	0.37	8.94	1.63	0.18	15.80	75%
Oatey ABS Cleaner	6.75	100.00%	44.40%	55.6%	40.00%	0.00%	0.00040	1.310	6.26	3.75	0.00	0.05	0.01	0.00	N/A	100%
Oatey ABS Cement	7.41	67.60%	0.00%	67.6%	0.00%	32.50%	0.00073	1.310	5.01	5.01	0.00	0.11	0.02	0.00	15.41	100%
Cyclo C192 Max Clean	8.33	98.00%	88.00%	10.0%	88.00%	2.00%	0.00100	1.310	6.94	0.83	0.00	0.03	0.00	0.00	41.65	100%
Evercoat Lite Wt. Bodyfiller	10.41	20.00%	16.20%	3.8%	0.00%	80.00%	0.00010	1.310	0.40	0.40	0.00	0.00	0.00	0.00	0.49	100%
CP 100 Touch N Seal Black Gun Foam	8.41	15.30%	0.00%	15.3%	0.00%	85.00%	0.00150	1.310	1.29	1.29	0.00	0.06	0.01	0.00	1.51	100%
S-M 6104 Roof Sealant	13.02	3.00%	0.00%	3.0%	0.00%	97.00%	0.11900	1.310	0.39	0.39	0.06	1.46	0.27	0.00	0.40	100%
Crazy Clean	8.39	100.00%	0.00%	100.0%	0.00%	0.00%	0.00750	1.310	8.39	8.39	0.08	1.98	0.36	0.00	N/A	75%
Sta-Put Adhensive 2001M Spray	5.91	75.00%	0.00%	75.0%	0.00%	25.00%	0.03130	1.310	4.43	4.43	0.18	4.36	0.80	0.07	17.73	75%
Tac Bond E900 Tile Adhensive	9.33	35.00%	0.00%	35.0%	0.00%	67.00%	0.01560	1.310	3.27	3.27	0.07	1.60	0.29	0.00	4.87	100%
										Uncontrolled Potential Emissions:	**2.68**	**64.34**	**11.74**	**2.51**		

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % MDI	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % Methylene Chloride	Weight % Styrene	Weight % Trichloroethylene	Weight % Perchloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	MDI Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Styrene Emissions (ton/yr)	Trichloroethylene Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)
92-01117 Rollie Williams Flat Black	11.24	0.17000	1.300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00
Rollie Williams AquaGlo 333 White	10.70	0.00029	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C112 Brake/Parts Cleaner	12.25	0.00065	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	30.00%	50.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.02
C33 Silicone Spray	5.59	0.00028	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C35 Undercoating	9.33	0.01300	1.310	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C900 Spray Adhensive	5.60	0.00520	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00
Accumetric Boss 380 RTV Silicone (BDI	8.66	0.19000	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Westech WT-HSC13 Contact Adhensive	6.66	0.08680	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	9.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Alumilastic SC0270 124 (H.B. Fuller)	13.47	0.01390	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Seymour 11056 Chrome Aluminum	6.33	0.00455	1.310	0.00%	47.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Seymour MRO Flat Black	7.50	0.01300	1.310	0.00%	0.00%	5.04%	0.00%	0.00%	0.00%	2.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.03	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
Seymour 11054 Red Oxide Primer	7.50	0.00130	1.310	3.57%	6.57%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Isopropyl Alcohol	6.70	0.12100	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WD40	6.80	0.06000	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey ABS Cleaner	6.75	0.00040	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey ABS Cement	7.41	0.00073	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo C192 Max Clean	8.33	0.00100	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Evercoat Lite Weight Bodyfiller	10.41	0.00010	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CP 100 Touch N Seal Black Gun Foam	8.41	0.00150	1.310	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S-M 6104 Roof Sealant	13.02	0.11900	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Crazy Clean	8.39	0.00750	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sta-Put Adhensive 2001M Spray	5.91	0.03130	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tac Bond E900 Tile Adhensive	9.33	0.01560	1.310	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.70%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
															Potential Emissions:	**0.00**	**0.22**	**0.03**	**0.01**	**0.00**	**0.37**	**0.22**	**0.01**	**0.02**	**0.00**	**0.01**	**0.02**

Worst Single HAP: **0.22** **Toluene**
Combined HAPs: **0.92**

Methodology:
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Painting Operations

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Particulate Control Efficiency
Seymour 11059 Gray Metal Primer	6.60	80.30%	26.70%	53.6%	0.40%	19.70%	0.00980	1.310	3.55	3.54	0.05	1.09	0.20	0.02	17.96	75%	95.00%
N5844 Flat Black Niles	10.69	30.78%	0.00%	30.78%	0.00%	55.17%	1.28000	1.310	3.29	3.29	5.52	132.36	24.16	13.58	5.96	75%	95.00%
N6051-530 Black Satin Enamel	10.55	33.17%	38.40%	33.17%	0.00%	50.93%	0.11700	1.310	3.50	3.50	0.54	12.87	2.35	1.18	6.87	75%	95.00%
										Uncontrolled Potential Emissions*:	**5.52**	**132.36**	**24.16**	**13.58**			
										Controlled Potential Emissions:	**5.52**	**132.36**	**24.16**	**0.68**			

Note:
* Paint Booth coatings are mutually exclusive and can only be used one at a time. Therefore, the potential to emit is determined from the worst case coating.

Methodology:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Seymour 11059 Gray Metal Prime	6.60	0.00980	1.310	13.70%	8.50%	0.00%	0.00%	3.10%	0.00%	0.00%	0.00%	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N5844 Flat Black Niles	10.69	1.28000	1.310	5.00%	12.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.92	9.42	1.57	0.00	0.00	0.00	0.00	0.00
N6051-530 Black Satin Enamel	10.55	0.11700	1.310	19.00%	1.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.35	0.07	0.28	0.00	0.00	0.00	0.00	0.00
											Potential Emissions*:	**3.92**	**9.42**	**1.57**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Single Worst HAP: **9.42** **Toluene**
Combined HAPs: **14.91**

Note:
* Paint Booth coatings are mutually exclusive and can only be used one at a time. Therefore, the potential to emit is determined from the worst case coating.

Methodology:
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
From Woodworking Operations

Company Name: Forest River, Inc. Cargo Mate Division
Address City IN Zip: 3731 California Street, Elkhart, IN 46514
Permit Number: 039-27057-00510
Plt ID: 039-00510
Reviewer: Jason R. Krawczyk
Date: October 21, 2008

Process	Max. Capacity (lbs/hr)	Control Efficiency	Emission Rate (lbs/hr)		Uncontrolled Potential Emissions (tons/yr		Controlled Potential Emissions (tons/yr	
			PM	PM_{10}	PM	PM_{10}	PM	PM_{10}
Woodworking	2280	95.00%	3.42	0.627	14.98	2.75	0.75	0.14

Process Weight Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (tons per year)
2,280	4.48	19.61
	(will be able to comply)	

Note:
Weight Percent (%) of Sawdust in the plywood and PM/PM10 wieght percentages in the saw dusts have been provided by the applicant for use in calculations for Permit No. M003-18051-00510.

In October of 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, 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.

Weight Percent	
Sawdust (%)	0.025
PM (%)	0.06
PM10 (%)	0.011

Methodology:
Emission Factor (lbs/trailer) = Max. Capacity (lbs/trailer)* Sawdust (%) * PM/PM10 (%).
Emisison Rate (lbs/hour) = Max. Capacity (lbs/trailer) * No. of Unit (Trailers/hr) * Emission Factor
Uncontrolled Potential Emissions (tons/year) = Emisison Rate (lbs./hour) * 8,760 hrs / 2,000 lbs
Controlled Potential Emissions (tons/yr) = Uncontrolled Potential Emissions * (1- Control Efficiency)

The allowable PM emission rate pursuant to 326 IAC 6-3-2(e), for weight rates up to 60,000 lb/hr is determined using the following formula:

E = 4.1 * P^0.67 where: E = allowable PM emission rate (lb/hr)
P = process weight rate (tons/hr)

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: **Forest River, Inc. Cargo Mate Division**
Address City IN Zip: **3731 California Street, Elkhart, IN 46514**
Permit Number: **039-27057-00510**
Plt ID: **039-00510**
Reviewer: **Jason R. Krawczyk**
Date: **October 21, 2008**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	7	0.18		0.0055	0.0005			0.007	0.001	0.000	0	0.001
EMISSION TOTALS												
Potential Emissions lbs/hr								0.01				0.00
Potential Emissions lbs/day								0.17				0.02
Potential Emissions tons/year								0.03				0.00

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.