



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: July 31, 2009

RE: Forest River, Inc.-Rance Trailer Div. / 039-28159-00696

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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Bill Conway
Forest River, Inc. - Rance Trailer Division
PO Box 3030
Elkhart, IN 46514

July 31, 2009

Re: Exempt Construction and Operation Status,
039-28159-00696

Dear Mr. Conway:

The application from Forest River, Inc. - Rance Trailer Division, received on June 29, 2009, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary trailer manufacturing source located at 3012 Mobile Drive, Elkhart, IN 46514 is classified as exempt from air pollution permit requirements:

- (a) One (1) surface coating operation, applying glues, adhesives, and caulks to wood flooring, identified as EU-1, constructed in 1998, with a maximum capacity of 0.63 units per hour; and
- (b) One (1) woodworking operation, identified as EU-2, constructed in 1998, controlled by one of four (4) portable dust collectors identified as CD-01, CD-02, CD-03, and CD-04, exhausting inside the building, with a maximum capacity of 0.63 units per hour.

Source Definition:

Forest River, Inc.'s Rance Trailer Division plant (source ID 039-00696) is located 1.5 miles from Forest River, Inc.'s Elkhart Coach Division plant (source ID 039-00686) and 1.8 miles from Forest River, Inc.'s Park Trailer Division plant (source ID 039-00474). Forest River has many other plants in Elkhart County, but they are all more than five miles from the Rance Trailer Division plant. IDEM, OAQ has examined whether the Rance Trailer Division plant, the Elkhart Coach Division plant and the Park Trailer Division plant are part of the same source. IDEM, OAQ finds that the three plants are not part of the same source. The Rance Trailer Division plant should be permitted separately from the other Forest River plants.

The following conditions shall be applicable:

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

Permit Reviewer: Jillian Bertram

2. 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

This exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Jillian Bertram, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5377 or at 1-800-451-6027 (ext 45377).

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/ JLB

cc: File - Elkhart County
Elkhart County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section
Bill MacDonald, DECA Environmental

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Description and Location

Source Name:	Forest River, Inc. - Rance Trailer Division
Source Location:	3012 Mobile Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3715
Exemption No.:	039-28159-00696
Permit Reviewer:	Jillian Bertram

On June 29, 2009, the Office of Air Quality (OAQ) received an application from Forest River, Inc., Rance Trailer Division related to the operation of an existing trailer manufacturing plant.

Source Definition

Forest River, Inc.'s Rance Trailer Division plant (source ID 039-00696) is located 1.5 miles from Forest River, Inc.'s Elkhart Coach Division plant (source ID 039-00686) and 1.8 miles from Forest River, Inc.'s Park Trailer Division plant (source ID 039-00474). Forest River has many other plants in Elkhart County, but they are all more than five miles from the Rance Trailer Division plant. IDEM, OAQ has examined whether the Rance Trailer Division plant, the Elkhart Coach Division plant and the Park Trailer Division plant are part of the same source. The term "source" is defined at 326 IAC 1-2-73. In order for these plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other(s); and,
- (3) the plants must be located on contiguous or adjacent properties.

All three plants are owned by Forest River, Inc. Since common ownership exists, the first part of the definition is met for all three plants.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the internet. All three plants have the two-digit SIC code, 37, for the Major Group of Transportation Equipment.

A plant is considered a support facility if at least fifty percent of its output is dedicated to another plant. None of the plants provides any output to the other plants. None of the plants qualifies as a support facility. However, since the plants have the same two-digit SIC Code they meet the second part of the source definition.

The last criterion of the definition is whether the three plants are on contiguous or adjacent properties. The Rance Trailer plant is located 1.5 miles from the Elkhart Coach plant and 1.8 miles from the Park Trailer Division plant. The Elkhart Coach plant and the Park Trailer Division plant are 2.3 miles apart. The plants are not located on contiguous properties.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality regarding the term "adjacent". This letter is in no way binding on IDEM, OAQ, but it is persuasive. Region VIII stated that any evaluation

of what is "adjacent" must relate the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

No materials are routinely transferred between the plants. Each plant has its own manager and no employees frequently shuttle back and forth between any of the plants. Each plant has its own human resources and payroll personnel. The production process itself is not split in any way between the plants. The plants operate independently of each other. Therefore the plants are not adjacent.

Since the plants do not meet the third part of the source definition, IDEM, OAQ finds that the three plants are not part of the same source. The Rance Trailer Division plant should be permitted separately from the other Forest River plants.

Existing Approvals

There have been no previous approvals issued to this source.

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

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.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River, Inc. - Rance Trailer Division on June 29, 2009, relating to the operation of an existing trailer manufacturing source.

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

- (a) One (1) surface coating operation, applying glues, adhesives, and caulks to wood flooring, identified as EU-1, constructed in 1998, with a maximum capacity of 0.63 units per hour; and
- (b) One (1) woodworking operation, identified as EU-2, constructed in 1998, controlled by one of four (4) portable dust collectors identified as CD-01, CD-02, CD-03, and CD-04, exhausting inside the building, with a maximum capacity of 0.63 units per hour.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

In October 1993 a Final Order Granting Summary Judgment was signed by 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.

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

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.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU-1	1.30	1.30	1.30	0.00	0.00	2.20	0.00	0.05	0.04 - toluene
EU-2	1.78	1.78	1.78	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	3.07	3.07	3.07	0.00	0.00	2.20	0.00	0.05	0.04 - toluene
Exemptions Levels	5	5	5	10	10	10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * 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".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

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.

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 Wood Building Products, 40 CFR 63.468, Subpart QQQQ, are not included in the permit, since the source only coats wood trailers and is not a major source for HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating at Area Sources, 40 CFR 63.1116, Subpart HHHHHH, are not included in the permit, since the source does not use coatings containing metal HAPs.
- (d) 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 permit.

Compliance Assurance Monitoring (CAM)

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

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it 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, 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this 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 Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Surface Coating Operation (EU-1)

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the surface coating operation is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.
- (i) There are no Article 8 rules applicable to this facility because actual VOC emissions are less than

15 pounds per day.

Woodworking Operation (EU-2)

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the woodworking operation are exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

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 June 29, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 039-28159-00696. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jillian Bertram 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)234-5377 or toll free at 1-800-451-6027 extension (4-5377).
- (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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Forest River, Rance Trailer Division
Address City IN Zip: 3012 Mobile Drive, Elkhart, IN 46514
Permit Number: 039-28159-00696
Reviewer: Jillian Bertram
Date: 7/13/2009

Material	Density (Lb/Gal)	Weight % Organics	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Adchem Adhesives, Adseal	10.5	3.0%	0.00%	0.28850	0.630	0.32	0.06	1.37	0.25	0.00	90%
Chem Tech Spray Adhesive	5.0	55.0%	0.00%	0.00080	0.630	2.75	0.00	0.03	0.01	0.00	90%
Cyclo Industries C11, C11 Brake Cleaner Spray	6.7	25.0%	0.00%	0.02460	0.630	1.67	0.03	0.62	0.11	0.00	90%
Cyclo Industries C35, Cyclo Rubberized Undercoating	8.5	40.0%	0.00%	0.00690	0.630	3.40	0.01	0.36	0.06	0.00	90%
DAP, Spray N Go Decorative Enamel	6.7	76.0%	0.00%	0.00230	0.630	5.08	0.01	0.18	0.03	0.00	90%
TCI Products, IPA, Isopropyl Alcohol	6.6	100.0%	0.00%	0.01540	0.630	6.55	0.06	1.53	0.28	0.00	90%
Tremco 45, Vulkem 45 Gray	11.0	9.0%	0.00%	0.00690	0.630	0.99	0.00	0.10	0.02	0.00	90%
Geocel, 2300 Clear, 2300 Clear Sealent	7.8	37.0%	0.00%	0.16770	0.630	2.87	0.30	7.28	1.33	0.00	90%
Basf 16338A, Laminex Part A	9.9	0.7%	99.30%	0.25380	0.630	0.07	0.01	0.27	0.05	0.69	90%
Basf 16059B, Laminex Part B	8.7	1.0%	99.00%	0.25380	0.630	0.08	0.01	0.32	0.06	0.60	90%

State Potential Emissions

0.50 12.06 2.20 1.30

METHODOLOGY

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) * (Weight % Non-Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

**Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations**

Company Name: Forest River, Rance Trailer Division
Address City IN Zip: 3012 Mobile Drive, Elkhart, IN 46514
Permit Number: 039-28159-00696
Reviewer: Jillian Bertram
Date: 7/13/2009

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Xylene	Weight % MEK	Weight % Toluene	Hexane Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)
Adchem Adhesives, Adseal	10.5	0.28850	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000
Chem Tech Spray Adhesive	5.0	0.00080	0.630	20.00%	0.00%	0.00%	5.00%	0.0022	0.0000	0.0000	0.0006
Cyclo Industries C11, C11 Brake Cleaner Spray	6.7	0.02460	0.630	0.00%	0.00%	0.00%	2.00%	0.0000	0.0000	0.0000	0.0091
Cyclo Industries C35, Cyclo Rubberized Undercoating	8.5	0.00690	0.630	0.00%	0.00%	0.00%	10.00%	0.0000	0.0000	0.0000	0.0162
DAP, Spray N Go Decorative Enamel	6.7	0.00230	0.630	0.00%	5.00%	10.00%	32.00%	0.0000	0.0021	0.0042	0.0136
TCI Products, IPA, Isopropyl Alcohol	6.6	0.01540	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000
Tremco 45, Vulkem 45 Gray	11.0	0.00690	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000
Geocel, 2300 Clear, 2300 Clear	7.8	0.16770	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000
Basf 16338A, Laminex Part A	9.9	0.25380	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000
Basf 16059B, Laminex Part B	8.7	0.25380	0.630	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000

Total State Potential Emissions	0.0022	0.0021	0.0042	0.0394
		Total		0.05

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
Woodworking**

Company Name: Forest River, Rance Trailer Division
Address City IN Zip: 3012 Mobile Drive, Elkhart, IN 46514
Permit Number: 039-28159-00696
Reviewer: Jillian Bertram
Date: 7/13/2009

PM/PM10/PM2.5 emissions from woodworking, based on amount of dust collected

Amount Collected	1.71 lb/unit/hr
Hours	2080 hr/yr
Efficiency	95.00%

Uncontrolled Emissions =	7.49 tons/yr
Controlled Emissions =	1.7784 tons/yr

Methodology

Uncontrolled Emissions = Amount Collected (lb/unit/hr) * 4 units * Hours (hours/yr) / 2000 (lbs/ton) / Efficiency (%)

Controlled Emissions = Amount Collected (lb/unit/hr) * 4 units * Hours (hours/yr) / 2000 (lbs/ton)

**Appendix A: Emissions Calculations
Source-wide Summary**

Company Name: Forest River, Rance Trailer Division
Address City IN Zip: 3012 Mobile Drive, Elkhart, IN 46514
Permit Number: 039-28159-00696
Reviewer: Jillian Bertram
Date: 7/13/2009

Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Total HAP (tons/yr)
EU-1	1.30	1.30	1.30	0.00	0.00	2.20	0.00	0.04	0.05
EU-2 *	1.78	1.78	1.78	0.00	0.00	0.00	0.00	0.00	0.00
Total	3.07	3.07	3.07	0.00	0.00	2.20	0.00	0.04	0.05

* Control Devices for Woodworking are considered integral to the process



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Bill Conway
VP Engineering
Forest River, Inc. -- Rance Trailer Division
PO Box 3030
Elkhart IN 46515

DATE: July 31, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Exemption
039-28159-00696

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	BLOCCHET 7/31/2009 Forest River, Inc. - Rance Trailer Division 039-28159-00696 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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											Remarks
1		Bill Conway VP Engineering Forest River, Inc. - Rance Trailer Division PO Box 3030 Elkhart IN 46515 (Source CAATS) Via Confirmed Delivery									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
6		Nickell Moulding Co., Inc. 3015 Mobile Dr. Elkhart IN 46514 (Affected Party)									
7		Medix 3008 Mobile Dr. Elkhart IN 46514 (Affected Party)									
8		Ramada Elkhart 3011 Belvedere Elkhart IN 46514 (Affected Party)									
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