



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: Dec. 18, 2009

RE: Forest River, Inc. - Glaval Bus Division / 039-28511-00126

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. - Glaval Bus
55135 CR 1 and 914 CR 1
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.: M039-28511-00126	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Dec. 18, 2009 Expiration Date: Dec. 18, 2019

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary bus, motor home, travel trailer, and trailer assembly source.

Source Address:	55135 CR 1 and 914 CR 1, Elkhart, Indiana 46514
Mailing Address:	PO Box 3030, Elkhart, IN 46514
General Source Phone Number:	574-534-6913
SIC Code:	3713
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:

Plant 1 - 55135 CR 1, Elkhart, IN 46514

- (a) One (1) spray paint booth, identified as Trailer Paint-1, located in Building C, constructed in 2002, equipped with HVLP spray guns and dry filters for particulate control, exhausting to Stack TP-1, capacity: 1.00 metal trailer per hour or 24.0 metal trailers per day.
- (b) One (1) surface coating operation, identified as Bus Paint-1, located in Building E, constructed in 1999, consisting of one (1) blackout area and one (1) bus refinishing area, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to Stack BP-1, capacity: 0.083 metal busses per hour or 2.00 metal busses per day for blackout and 0.170 metal busses per hour or 4.00 metal busses per day for refinishing.
- (c) Thirty-nine (39) natural gas-fired space heaters, heat input capacity: 1.04 million British thermal units per hour, each.
- (d) Fifty-one (51) metal inert gas (MIG) welding stations, capacity: 0.21 pounds of rod or wire per hour per station.

Plant 9 - 914 CR 1, Elkhart, IN 46514

- (e) One (1) hot melt rolling facility, identified as Roll Coater 1, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating wood and plastic parts.
- (f) Two (2) bead applicators, identified as Bead Application 1 & 2, constructed in 1999,

exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, each, coating wood and plastic parts.

- (g) One (1) bus assembly operation, identified as Bus Assembly 1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating plastic parts.
- (h) One (1) recreation vehicle (RV) assembly operation, identified as B and C Assembly Area, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 0.25 RVs per hour or 6.00 RVs per day, coating plastic parts.

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, 039-28511-00126, 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 and Enforcement 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 039-28511-00126 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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

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

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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) spray paint booth, identified as Trailer Paint-1, located in Building C, constructed in 2002, equipped with HVLP spray guns and dry filters for particulate control, exhausting to Stack TP-1, capacity: 1.00 metal trailer per hour or 24.0 metal trailers per day.

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

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

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at Trailer Paint -1.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Trailer Paint - 1 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.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Trailer Paint -1 and the dry filters.

Compliance Determination Requirements

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

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manu-

facturer 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.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Forest River Inc. - Glaval Bus
Source Address: 55135 CR 1 and 914 CR 1, Elkhart, Indiana 46514
Mailing Address: PO Box 3030, Elkhart, IN 46514
MSOP No.: 039-28511-00126

**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 AND ENFORCEMENT 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. - Glaval Bus
Address:	55135 CR 1 and 914 CR 1
City:	Elkhart, Indiana 46514
Phone #:	574-534-6913
MSOP #:	039-28511-00126

I hereby certify that Forest River Inc. - Glaval Bus is :

still in operation.

no longer in operation.

I hereby certify that Forest River Inc. - Glaval Bus is :

in compliance with the requirements of MSOP 039-28511-00126.

not in compliance with the requirements of MSOP 039-28511-00126.

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

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

Source Background and Description

Source Name:	Forest River Inc. - Glaval Bus Division
Source Location:	55135 CR 1 (Plant 1) and 914 CR 1 (Plant 9), Elkhart, IN 46514
County:	Elkhart
SIC Code:	3713
Permit Renewal No.:	039-28511-00126
Permit Reviewer:	Jillian Bertram

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Forest River Inc. - Glaval Bus Division relating to the operation of an existing stationary bus, motor home, travel trailer, and trailer assembly source. Plant 1, located at 55135 CR1, Elkhart, IN and Plant 9, located at 914 CR 1, Elkhart, IN are permitted as one source pursuant to T039-6955-00126, issued February 9, 1999.

History

On September 29, 2009, Forest River Inc. - Glaval Bus Division submitted an application to the OAQ requesting to renew its operating permit. Forest River Inc. - Glaval Bus was issued a MSOP on September 29, 2005. Since, this source has not received any other approvals.

Source Definition

Forest River, Inc.'s Glaval Bus Division plant (source ID 039-00126) is located 0.7 miles from Forest River, Inc.'s Cargo Mate/Continental Cargo Division plant (source ID 039-00510). Forest River has many other plants in Elkhart County, but they are all more than four miles from the Glaval Bus Division plant. IDEM, OAQ has examined whether the Glaval Bus Division plant and the Cargo Mate / Continental Cargo 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.

Both are owned by Forest River, Inc. Since common ownership exists, the first part of the definition is met for both 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. Both 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. Neither plant provides any output to the other plant. Neither plant 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 plants are on contiguous or adjacent properties. The Glaval Bus Division plant is located 0.7 miles from the Cargo Mate/ Continental Cargo Division plant. 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, 1998 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 the plants. 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 plants are not part of the same source. The Glaval Bus Division plant should be permitted separately from the Cargo Mate/ Continental Cargo Division plant.

Permitted Emission Units and Pollution Control Equipment

Plant 1 - 55135 CR 1, Elkhart, IN 46514

- (a) One (1) spray paint booth, identified as Trailer Paint-1, located in Building C, constructed in 2002, equipped with HVLP spray guns and dry filters for particulate control, exhausting to Stack TP-1, capacity: 1.00 metal trailer per hour or 24.0 metal trailers per day.
- (b) One (1) surface coating operation, identified as Bus Paint-1, located in Building E, constructed in 1999, consisting of one (1) blackout area and one (1) bus refinishing area, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to Stack BP-1, capacity: 0.083 metal busses per hour or 2.00 metal busses per day for blackout and 0.170 metal busses per hour or 4.00 metal busses per day for refinishing.
- (c) Thirty-nine (39) natural gas-fired space heaters, heat input capacity: 1.04 million British thermal units per hour, each.
- (d) Fifty-one (51) metal inert gas (MIG) welding stations, capacity: 0.21 pounds of rod or wire per hour per station.

Plant 9 - 914 CR 1, Elkhart, IN 46514

- (e) One (1) hot melt rolling facility, identified as Roll Coater 1, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating wood and plastic parts.

- (f) Two (2) bead applicators, identified as Bead Application 1 & 2, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, each, coating wood and plastic parts.
- (g) One (1) bus assembly operation, identified as Bus Assembly 1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating plastic parts.
- (h) One (1) recreation vehicle (RV) assembly operation, identified as B and C Assembly Area, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 0.25 RVs per hour or 6.00 RVs per day, coating plastic parts.

Existing Approvals

Since the issuance of the MSOP (039-17360-00126) on September 29, 2005, there have been no approvals issued to this source.

Enforcement Issue

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 PM_{2.5}.

(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 Counties 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 Counties 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	6.37
PM ₁₀	7.38
PM _{2.5}	7.38
SO ₂	0.11
VOC	47.96
CO	14.92
NO _x	17.77

HAPs	tons/year
xylene	9.00
toluene	4.92
glycol ethers	3.42
hexane	0.32
manganese	0.02
Total	19.76

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 less than 100 tons per year. 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.

Potential to Emit After Issuance

Process/ Emission Unit	Potential to Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Plant 1								
Bus Paint - 1	0.75	0.75	0.75	0.00	6.59	0.00	0.00	3.04
Trailer Paint - 1	3.86	3.86	3.86	0.00	7.61	0.00	0.00	5.53
Space Heaters	0.34	1.35	1.35	0.11	0.98	14.92	17.77	0.34
Welding	0.26	0.26	0.26	0.00	0.00	0.00	0.00	0.02
Plant 9								
Roll Coater 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bead Application 1 and 2	0.00	0.00	0.00	0.00	1.35	0.00	0.00	0.00
Bus Assembly 1	0.46	0.46	0.46	0.00	8.01	0.00	0.00	2.65
B and C Assembly Area	0.70	0.70	0.70	0.00	23.42	0.00	0.00	8.18
Total	6.37	7.38	7.38	0.11	47.96	14.92	17.77	19.76
Title V Source Threshold	NA	100	100	100	100	100	100	25
PSD Source Threshold	250	250	250	250	250	250	250	NA

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) 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.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60.31, Subpart EE, are not included in the permit for any of the surface coating units. The source does not coat furniture.
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.39, Subpart MM, are not included in the permit for any of the surface coating units because the buses are each capable of transporting more than 12 passengers.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts, Subpart MMMM are not included in the permit for any of the surface coating units because this source is not a major source for HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Source, Subpart HHHHHH are not included in the permit for any of the surface coating units because the source does not meet the definition of a refinishing operation.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11, Subpart XXXXXX, are not included in the permit because the source's SIC code (3713) is not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in welding operations emitting manganese, it does not qualify as one of the nine source categories, rendering this rule not applicable.
- (b) 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.

State Rule Applicability - Entire Source

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.

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:

- (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.

State Rule Applicability – Individual Facilities

Bus Paint - 1

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from Bus Paint - 1 is less than 0.551 pounds per hour.
- (b) 326 IAC 8-1-6 (General VOC Requirements)
This rule does not apply because the potential to emit VOC from Bus Paint - 1 is less than 25 tons per year.
- (c) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
Although the source is located in Elkhart County and Bus Paint - 1 emits VOC, coats miscellaneous metals, and was constructed after Nov. 1, 1980, this rule does not apply because the actual VOC emissions from Bus Paint - 1 are less than 15 pounds per day. This is based on the source's current operation at 8 hours per day as confirmed by the source.

Trailer Paint - 1

- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from Trailer Paint - 1, at all times when the paint booth is in operation.

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

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground. If overspray is visibly detected, the source 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.
 - (3) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or changes 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.
- (e) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
Trailer Paint - 1, constructed in 2002, coats metal under two (2) digit Standard Industrial Classification Code 37 and has a potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the following requirements are applicable to this emission unit:
 - (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators (as mixed) at Trailer Paint - 1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

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

Based on MSDS sheets submitted by the source and the source's current work practice standards, the source is able to comply with this rule.

Space Heaters

- (f) 326 IAC 6-2 (Particulate Emission Standards for Indirect Heating)
The requirements of this rule do not apply because the space heaters are direct heating units.
- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from the space heaters is less than 0.551 pounds per hour.

Welding

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from the welding units is less than 0.551 pounds per hour and pursuant to 326 IAC 6-1-3(b)(9) because the welding units use less than 625 pounds of welding wire per day.

Roll Coater 1

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from Roll Coater 1 is less than 0.551 pounds per hour.
- (j) 326 IAC 8-1-6 (General VOC Requirements)
This rule does not apply because the potential to emit VOC from Roll Coater 1 is less than 25 tons per year.
- (k) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
This rule does not apply to Roll Coater 1 because the unit does not coat metal.

Bead Application 1 & 2

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from Bead Application 1 & 2 is less than 0.551 pounds per hour.
- (m) 326 IAC 8-1-6 (General VOC Requirements)
This rule does not apply because the potential to emit VOC from Bead Application 1 & 2 is less than 25 tons per year.
- (n) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
This rule does not apply to Bead Application 1 & 2 because the unit does not coat metal.

Bus Assembly 1

- (o) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)

Pursuant to 326 IAC 6-3-1(b)(8), the requirements of 326 IAC 6-3 do not apply because Bus Assembly 1 uses less than 5 gallons of coating per day.

- (p) 326 IAC 8-1-6 (General VOC Requirements)
This rule does not apply because the potential to emit VOC from Bus Assembly 1 is less than 25 tons per year.
- (q) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
This rule does not apply to Bus Assembly 1 because the only metal parts coated by Bus Assembly 1 are attached to structural pieces of wood.

B and C Assembly Area

- (r) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Sources)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 do not apply because the potential to emit particulate from B and C Assembly Area is less than 0.551 pounds per hour.
- (s) 326 IAC 8-1-6 (General VOC Requirements)
This rule does not apply because the potential to emit VOC from B and C Assembly Area is less than 25 tons per year.
- (t) 326 IAC 8-2-9 (VOC Emission Standards for Miscellaneous Metal Coating)
This rule does not apply to B and C Assembly Area because the only metal parts coated by B and C Assembly Area are attached to structural pieces of wood.

Compliance Determination and Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows: Trailer Paint - 1 has applicable compliance determination conditions as specified below:

Compliance with 326 IAC 8-2-9 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Recommendation

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

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

An application for the purposes of this review was received on September 29, 2009.

Conclusion

The operation of this existing stationary bus, motor home, travel trailer, and trailer assembly source shall be subject to the conditions of the attached MSOP Renewal No. 039-28511-00126.

**Appendix A: Emissions Calculations
VOC and Particulate
From Plant 1 Surface Coating Operations**

**Company Name: Forest River, Inc., Glaval Bus Division
Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
Permit Number: 039-28511-00126
Reviewer: Jillian Bertram
Date: October 9, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 1																	
Bus Paint-1 (Buildings E)																	
BLACKOUT AREA																	
Base Mix Enamel																	
806J	8.24	52.30%	0.00%	52.3%	0.00%	40.43%	0.0767	0.083	4.31	4.31	0.03	0.66	0.120	0.027	10.66	75%	Metal
150K	7.29	90.33%	19.20%	71.1%	19.20%	7.50%	0.2126	0.083	6.42	5.19	0.09	2.20	0.401	0.014	69.14	75%	Metal
175K	7.68	68.79%	10.40%	58.4%	10.40%	25.47%	0.0857	0.083	5.00	4.48	0.03	0.77	0.140	0.019	17.61	75%	Metal
7175S	6.65	99.80%	9.00%	90.8%	9.00%	0.13%	0.3750	0.083	6.64	6.04	0.19	4.51	0.823	0.000	4644.77	75%	Metal
Clearcoat																	
HC7600S	7.55	64.99%	9.40%	55.6%	9.40%	28.13%	0.5500	0.083	4.63	4.20	0.19	4.60	0.84	0.132	14.92	75%	Metal
REFINISHING AREA																	
Base Mix Enamel																	
801J	13.3	27.00%	0.00%	27.0%	0.00%	49.65%	0.0394	0.170	3.60	3.60	0.02	0.58	0.106	0.071	7.25	75%	Metal
807J	8.15	51.50%	0.00%	51.5%	0.00%	42.03%	0.0429	0.170	4.20	4.20	0.03	0.73	0.134	0.032	9.99	75%	Metal
882J	8.74	45.80%	0.00%	45.8%	0.00%	44.30%	0.0430	0.170	4.00	4.00	0.03	0.70	0.128	0.038	9.04	75%	Metal
150K	7.29	90.50%	19.20%	71.3%	19.20%	7.50%	0.1052	0.170	6.43	5.20	0.09	2.23	0.407	0.014	69.30	75%	Metal
175K	7.68	65.10%	10.40%	54.7%	10.40%	25.47%	0.1257	0.170	4.69	4.20	0.09	2.15	0.393	0.063	16.49	75%	Metal
7160S	6.62	99.80%	0.00%	99.8%	0.00%	0.20%	0.3563	0.170	6.61	6.61	0.40	9.60	1.75	0.001	3303.38	75%	Metal
Clearcoat																	
HC7600S	7.55	55.60%	17.20%	38.4%	17.20%	28.13%	0.3913	0.170	3.50	2.90	0.19	4.63	0.84	0.244	10.31	75%	Metal
HC7607S	8.33	52.80%	0.00%	52.8%	0.00%	39.89%	0.1088	0.170	4.40	4.40	0.08	1.95	0.356	0.080	11.03	75%	Metal
Primer																	
131S	11.2	41.30%	0.00%	41.3%	0.00%	36.14%	0.0065	0.170	4.60	4.60	0.01	0.12	0.022	0.008	12.74	75%	Metal
3642S	6.59	100.00%	30.20%	69.8%	30.20%	0.00%	0.0065	0.170	6.59	4.60	0.01	0.12	0.022	0.000	N/A	75%	Metal
Precoat																	
222S	7.08	76.30%	18.40%	57.9%	18.40%	41.10%	0.0340	0.170	5.02	4.10	0.02	0.57	0.104	0.011	9.97	75%	Metal
Gun Cleaner																	
3949S	8.25	99.86%	99.46%	0.4%	99.46%	0.14%	0.0114	0.170	6.11	0.03	0.0001	0.002	0.0003	0.00002	23.57	75%	Metal
									PM Control Efficiency: 95.00%								
									Subtotal Uncontrolled 1.505 36.129 6.594 0.753								
									Subtotal Controlled 1.505 36.13 6.59 0.038								

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VOC and Particulate
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Permit Number: 039-28511-00126
Reviewer: Jillian Bertram
Date: October 9, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 1																	
Trailer Paint-1 (Building C)																	
N-7618-Black Hi Solid Gloss	10.5	33.00%	0.00%	33.00%	0.00%	67.00%	0.5000	1.00	3.47	3.47	1.74	41.70	7.61	3.86	N/A	75%	Metal

PM Control Efficiency: 95.00%

Subtotal Uncontrolled	1.74	41.70	7.61	3.86
Subtotal Controlled	1.74	41.70	7.61	0.193

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 9																	
Roll Coater-1 (Hot Melt Roller)																	
Dynaflake Roll Cleaner	8.00	0.00%	0.00%	0.00%	0.00%	100%	0.0090	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Plastic
Everflex 2U265	7.66	0.00%	0.00%	0.00%	0.00%	100%	2.0000	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Plastic

PM Control Efficiency: 0.00%

Subtotal Uncontrolled	0.00	0.00	0.000	0.000
Subtotal Controlled	0.00	0.00	0.000	0.000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 9																	
Bead Application 1 & 2																	
Hybond SIA 113	9.16	0.00%	0.00%	0.00%	0.00%	100%	2.0000	0.500	0.00	0.00	0.00	0.00	0.000	0.000	0.000	100%	Wood, Plastic
Benzoflex 352	10.25	100.00%	0.00%	100.00%	0.00%	0.00%	0.0600	0.500	10.3	10.3	0.308	7.38	1.35	0.000	N/A	100%	Wood, Plastic
Dynosolve CU-6	8.83	0.99%	0.00%	0.99%	0.00%	99.9%	0.0200	0.500	0.09	0.09	0.00	0.02	0.004	0.000	0.088	100%	Wood, Plastic

PM Control Efficiency: 0.00%

Subtotal Uncontrolled	0.31	7.40	1.35	0.000
Subtotal Controlled	0.31	7.40	1.35	0.000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 9																	
Bus Assembly 1																	
Spray Rite High Temp Spray Adhesive	5.0	65.0%	20.0%	45.0%	20.0%	15.00%	0.9500	0.250	2.81	2.25	0.53	12.83	2.34	0.455	15.0	75%	Plastic, Metal
Silaprene	9.75	6.30%	0.0%	6.3%	93.7%	93.70%	1.0250	0.250	9.75	0.61	0.16	3.78	0.689	0.000	N/A	100%	Plastic
Sika Tack Ultrafast Adhesive	10.83	5.0%	0.0%	5.0%	95.0%	95.00%	0.1790	0.250	10.83	0.54	0.02	0.58	0.106	0.000	N/A	100%	Plastic
Premium Adhesive 7227	6.64	40.05%	30.0%	10.1%	30.00%	20.95%	0.1140	0.250	0.95	0.67	0.02	0.46	0.083	0.000	N/A	100%	Rubber, Plastic
Surebond 190 Adhesive	7.66	38.0%	0.0%	38.0%	0.0%	62.00%	0.1250	0.250	2.91	2.91	0.09	2.18	0.398	0.000	N/A	100%	Rubber
IsoGrip Adhesive Laminator SP 3030 D	9.16	0.0%	0.0%	0.0%	0.0%	100.00%	0.0090	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	Wood
Surebond SB299 Sealant	9.75	8.0%	0.0%	8.0%	0.0%	92.00%	1.8880	0.250	0.78	0.78	0.37	8.84	1.61	0.000	N/A	100%	Plastic
Citra-Solve	6.62	100%	0.0%	100.0%	0.0%	0.00%	0.2510	0.250	6.62	6.62	0.42	9.97	1.82	0.000	N/A	100%	Plumbing
DAP Black Touch N Tone Spray Paint	5.58	65.0%	30.0%	35.0%	30.0%	5.00%	0.0080	0.250	2.79	1.95	0.00	0.09	0.017	0.004	39.1	75%	Plastic
Buckey XL100	8.41	95.0%	83.0%	12.0%	83.0%	5.00%	0.0680	0.250	5.94	1.01	0.02	0.41	0.075	0.000	N/A	100%	Plastic
Sikaflex 221	9.91	4.40%	0.0%	4.4%	0.0%	95.60%	0.0380	0.250	0.44	0.44	0.00	0.10	0.018	0.000	N/A	100%	Plastic, Metal
3M UltraPro Autobody Sealant	9.91	5.00%	0.0%	5.0%	0.0%	95.00%	0.0030	0.250	0.50	0.50	0.00	0.01	0.002	0.000	N/A	100%	Rubber
Final Kleen - 3901-S	6.05	100%	0.0%	100.0%	0.0%	0.00%	0.1280	0.250	6.05	6.05	0.19	4.65	0.848	0.000	N/A	100%	ABS Plastic
Premium Adhesive 7355	7.09	75.0%	75.0%	0.0%	75.0%	25.00%	0.1250	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	ABS Plastic
Red/Blue Hardener	10.0	20.0%	20.0%	0.0%	20.0%	80.00%	0.0010	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	Rubber

PM Control Efficiency: 0.00%

Subtotal Uncontrolled	1.83	43.89	8.01	0.459
Subtotal Controlled	1.83	43.89	8.01	0.459

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VOC and Particulate
From Plant 1 Surface Coating Operations**

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Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
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Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Type of Material coated
Plant 9																	
B and C Assembly Area																	
Lap Sealant	9.9	32.50%	0.00%	32.5%	0.00%	67.50%	0.4980	0.250	3.22	3.22	0.40	9.62	1.76	0.000	4.77	100%	Rubber
Oatey ABS Cement	7.25	78.00%	0.00%	78.0%	0.00%	22.00%	0.0250	0.250	5.66	5.66	0.04	0.85	0.155	0.000	25.70	100%	ABS Plastic
Oatey Cleaner	6.61	100.00%	10.00%	90.0%	10.00%	0.00%	0.0040	0.250	6.61	5.95	0.01	0.14	0.026	0.000	N/A	100%	ABS Plastic
Construction Silicone	8.66	5.00%	0.00%	5.0%	0.00%	95.00%	0.2000	0.250	0.43	0.43	0.02	0.52	0.095	0.000	0.46	100%	Rubber, Plastic
Bonding Cement	8.20	50.00%	49.90%	0.1%	49.90%	50.00%	1.0800	0.250	0.02	0.01	0.00	0.05	0.010	0.000	0.02	100%	Rubber
Super Bond 4H	7.50	72.30%	0.00%	72.3%	0.00%	27.70%	0.2200	0.250	5.42	5.42	0.30	7.16	1.31	0.000	19.58	100%	Fabric
WEB 76 Adhesived	5.83	77.20%	25.00%	52.2%	25.00%	16.00%	0.3100	0.250	4.06	3.04	0.24	5.66	1.03	0.000	19.02	100%	Fabric
Panel Hold Black RV Foam	8.41	14.20%	0.00%	14.2%	0.00%	85.80%	0.9200	0.250	1.19	1.19	0.27	6.59	1.20	0.000	N/A	100%	Panel Glue
Panel Hold Cleaner	6.58	100.00%	85.00%	15.0%	85.00%	0.00%	0.0090	0.250	6.58	0.99	0.00	0.05	0.010	0.000	N/A	100%	Panel Glue
Denatured Alcohol	6.76	100.00%	7.00%	93.0%	7.00%	0.00%	0.0090	0.250	6.76	6.29	0.01	0.34	0.062	0.000	N/A	100%	Plastic, Metal
Ethanol	6.70	100.00%	5.00%	95.0%	5.00%	0.00%	0.2100	0.250	6.70	6.37	0.33	8.02	1.46	0.000	N/A	100%	Plastic, Metal
Battery Protector C121	6.00	73.00%	7.00%	66.0%	7.00%	20.00%	0.0120	0.250	4.26	3.96	0.01	0.29	0.052	0.000	19.80	100%	Battery
Citra Foam	7.96	100.00%	0.00%	100.0%	0.00%	0.00%	0.0670	0.250	7.96	7.96	0.13	3.20	0.584	0.000	N/A	100%	Plastic
Color Flex	13.16	17.00%	0.00%	17.0%	0.00%	83.00%	0.1800	0.250	2.24	2.24	0.10	2.42	0.441	0.000	2.70	100%	Wood
Spray N Go Paint	6.66	75.20%	0.00%	75.2%	0.00%	24.80%	0.9840	0.250	5.01	5.01	1.23	29.57	5.40	0.445	20.19	75%	Metal (Auto Ref)
Glass Cleaner	8.25	93.50%	93.50%	0.0%	93.50%	7.50%	0.2400	0.250	0.00	0.00	0.00	0.00	0.000	0.035	0.00	75%	Glass
Instand Bond White Glue	9.16	72.00%	71.50%	0.5%	71.50%	28.00%	1.2000	0.250	0.16	0.05	0.01	0.33	0.060	0.000	0.16	100%	Wood
Mastic	12.50	0.00%	0.00%	0.0%	0.00%	100.00%	0.4300	0.250	0.00	0.00	0.00	0.00	0.000	0.000	0.00	100%	Plastic
Brake & Parts Cleaner	12.00	100.00%	72.00%	28.0%	72.00%	0.00%	0.0010	0.250	12.00	3.36	0.00	0.02	0.004	0.000	N/A	100%	Engine Parts
Mineral Spirits	6.31	100.00%	0.00%	100.0%	0.00%	0.00%	0.0050	0.250	6.31	6.31	0.01	0.19	0.035	0.000	N/A	100%	Metal
Geocell 2320	7.91	35.10%	0.00%	35.1%	0.00%	64.90%	0.0457	0.250	2.78	2.78	0.03	0.76	0.139	0.000	4.28	100%	Plastic
DAP 4000 Construction Adhesive	8.85	38.70%	0.00%	38.7%	0.00%	61.30%	0.2600	0.250	3.42	3.42	0.22	5.34	0.975	0.000	5.59	100%	Lam. Floor
Elastomeric Clear Sealant	7.83	32.50%	0.00%	32.5%	0.00%	65.00%	0.1500	0.250	2.54	2.54	0.10	2.29	0.418	0.000	3.92	100%	Plastic
Sta-Put 2001M	5.91	75.00%	0.00%	75.0%	0.00%	25.00%	0.5430	0.250	4.43	4.43	0.60	14.44	2.64	0.220	17.73	75%	Fabric
3M SuperDuty Rubbing Compound	8.33	44.20%	17.90%	26.3%	17.90%	55.80%	0.0080	0.250	2.67	2.19	0.00	0.11	0.019	0.000	3.93	100%	Metal
Finishing Putty (Icing)	9.58	24.50%	0.00%	24.5%	0.00%	75.50%	0.0080	0.250	2.35	2.35	0.00	0.11	0.021	0.000	3.11	100%	Plastic
Enerbond 45 SF	10.00	100.00%	0.00%	100.0%	0.00%	0.00%	0.3420	0.250	N/A	10.00	0.86	20.52	3.74	0.000	N/A	100%	Plastic, Laminate
Enerbond 10 Cleaner	7.98	95.80%	0.00%	95.8%	0.00%	4.20%	0.0010	0.250	7.64	7.64	0.00	0.05	0.008	0.000	N/A	75%	Plastic, Laminate
Gelcoat Filon Panel White	10.83	36.70%	0.00%	36.7%	0.00%	63.30%	0.0200	0.250	3.97	3.97	0.02	0.48	0.087	0.000	6.28	100%	Plastic
3M Perfect It Foam Polishing Pad Glaze	8.78	86.00%	60.00%	26.0%	60.00%	14.00%	0.0020	0.250	5.71	2.28	0.00	0.03	0.005	0.000	16.31	100%	Fabric
ITW Foamseal S11608	9.83	39.00%	0.00%	39.0%	0.00%	61.00%	0.3940	0.250	3.83	3.83	0.38	9.06	1.65	0.000	6.28	100%	Plastic, Metal
ITW Foamseal FSA	10.33	0.00%	0.00%	0.0%	0.00%	100.00%	0.3940	0.250	N/A	0.00	0.00	0.00	0.000	0.000	N/A	100%	Plastic, Metal
Feather Rite Body Filler	9.66	18.60%	0.00%	18.6%	0.00%	81.40%	0.0010	0.250	1.80	1.80	0.00	0.01	0.002	0.000	2.21	100%	Plastic
Lacquer Thinner	7.00	100.00%	0.00%	100.0%	0.00%	28.13%	0.0030	0.250	7.00	7.00	0.01	0.13	0.023	0.000	24.88	100%	Metal, Plastic

Note that all coatings are "as applied" to the applicators

PM Control Efficiency: 0.00%					
Subtotal Uncontrolled		5.35	128	23.4	0.700
Subtotal Controlled		5.35	128	23.4	0.700

State Potential Emissions

Add worst case coating to all solvents

Total Uncontrolled		10.73	257.46	46.99	5.77
Total Controlled		10.73	257	47.0	1.39

METHODOLOGY FOR PAGES 1 - 3

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
HAPs from Surface Coating Operations**

**Company Name: Forest River, Inc., Glaval Bus Division
Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
Permit Number: 039-28511-00126
Reviewer: Jillian Bertram
Date: 10/9/2009**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % EB	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MA	Weight % 1,2,4 TMB	Weight % Hexane	Weight % PCE	Weight % MeCl	Weight % DEHP	Weight % GE	Weight % Cumene	Weight % Styrene	Weight % VA	Weight % TCE	EB PTE (ton/yr)	MIBK PTE (ton/yr)	Toluene PTE (ton/yr)	Xylene PTE (ton/yr)	MA PTE (ton/yr)	1,2,4 TMB PTE (ton/yr)	Hexane PTE (ton/yr)	PCE PTE (ton/yr)	MeCl PTE (ton/yr)	DEHP PTE (ton/yr)	GE PTE (ton/yr)	Cumene PTE (ton/yr)	Styrene PTE (ton/yr)	VA PTE (ton/yr)	TCE PTE (ton/yr)	Subtotal PTE (ton/yr)																	
Trailer Paint-1 (Building C) N-7618-Black Hi Solid Gloss	10.5	0.5000	1.00	0.00%	0.00%	0.00%	24.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	5.53	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	5.535																
Subtotal																			0.000	0.000	0.00	5.53	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	5.53	0.000	5.53										

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % EB	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MA	Weight % 1,2,4 TMB	Weight % Hexane	Weight % PCE	Weight % MeCl	Weight % DEHP	Weight % GE	Weight % Cumene	Weight % Styrene	Weight % VA	Weight % TCE	EB PTE (ton/yr)	MIBK PTE (ton/yr)	Toluene PTE (ton/yr)	Xylene PTE (ton/yr)	MA PTE (ton/yr)	1,2,4 TMB PTE (ton/yr)	Hexane PTE (ton/yr)	PCE PTE (ton/yr)	MeCl PTE (ton/yr)	DEHP PTE (ton/yr)	GE PTE (ton/yr)	Cumene PTE (ton/yr)	Styrene PTE (ton/yr)	VA PTE (ton/yr)	TCE PTE (ton/yr)	Subtotal PTE (ton/yr)																		
Plant 9 Roll Coater-1 (Hot Melt Roller)																																																				
Dynaflex Roll Cleaner	8.00	0.0090	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000																	
Everlock 2U265	7.66	2.0000	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000																	
Subtotal																			0.000	0.000	0.0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % EB	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MA	Weight % 1,2,4 TMB	Weight % Hexane	Weight % PCE	Weight % MeCl	Weight % DEHP	Weight % GE	Weight % Cumene	Weight % Styrene	Weight % VA	Weight % TCE	EB PTE (ton/yr)	MIBK PTE (ton/yr)	Toluene PTE (ton/yr)	Xylene PTE (ton/yr)	MA PTE (ton/yr)	1,2,4 TMB PTE (ton/yr)	Hexane PTE (ton/yr)	PCE PTE (ton/yr)	MeCl PTE (ton/yr)	DEHP PTE (ton/yr)	GE PTE (ton/yr)	Cumene PTE (ton/yr)	Styrene PTE (ton/yr)	VA PTE (ton/yr)	TCE PTE (ton/yr)	Subtotal PTE (ton/yr)																		
Plant 9 Bead Application 1 & 2																																																				
Hybond SIA 113	9.16	2.0000	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000																	
BenzoFlex 352	10.25	0.0600	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000																	
Dynasolve CU-6	8.83	0.0200	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000																	
Subtotal																			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % EB	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MA	Weight % 1,2,4 TMB	Weight % Hexane	Weight % PCE	Weight % MeCl	Weight % DEHP	Weight % GE	Weight % Cumene	Weight % Styrene	Weight % VA	Weight % TCE	EB PTE (ton/yr)	MIBK PTE (ton/yr)	Toluene PTE (ton/yr)	Xylene PTE (ton/yr)	MA PTE (ton/yr)	1,2,4 TMB PTE (ton/yr)	Hexane PTE (ton/yr)	PCE PTE (ton/yr)	MeCl PTE (ton/yr)	DEHP PTE (ton/yr)	GE PTE (ton/yr)	Cumene PTE (ton/yr)	Styrene PTE (ton/yr)	VA PTE (ton/yr)	TCE PTE (ton/yr)	Subtotal PTE (ton/yr)													
Plant 9 Bus Assembly 1																																															
Spray Rate High Temp Spray Adhesive	5.0	0.9500	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000												
Silaprene	9.75	1.0250	0.250	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.547	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.547												
Sika Tack Ultrafast Adhesive	10.83	0.1790	0.250	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.106	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.106													
Premium Adhesive 7227	6.64	0.1140	0.250	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.332	0.000	0.000	0.083	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.414														
Surebond 190 Adhesive IsoGrip Adhesive Laminator SP 3030 D	7.66	0.1250	0.250	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.419	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.419														
Surebond SB299 Sealant	9.75	1.8880	0.250	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	1.008	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.008														
Citra-Solve	6.62	0.2510	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000														
DAP Black Touch N Tone Spray Paint	5.58	0.0080	0.250	0.00%	0.00%	13.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.007	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000														
Buckey XL100	8.41	0.0680	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000													
Sikaflex 221	9.91	0.0380	0.250	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.021	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.021														
3M UltraPro Autobody Sealant	9.91	0.0030	0.250	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.002	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.002														
Final Kleen - 3901-S	6.05	0.1280	0.250	0.00%	0.00%	13.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.110	0.017	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.127														
Premium Adhesive 7355	7.99	0.1250	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000													
Red/Blue Hardener	10.0	0.0010	0.250	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%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000													
Subtotal																			0.00	0.00	0.87	1.70	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	0.00	0.00	0.00	0.87	1.70	0.00	0.08	0.00	0.00	0.00	0.00	0

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100 - Space Heaters

Company Name: Forest River, Inc., Glaval Bus Division
Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
Permit Number: 039-28511-00126
Reviewer: Jillian Bertram
Date: 10/9/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

40.6

355.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.3	1.4	0.1	17.8	1.0	14.9

*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 next page for HAPs emission Calculations

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

**Company Name: Forest River, Inc., Glaval Bus Division
 Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
 Permit Number: 039-28511-00126
 Reviewer: Jillian Bertram
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HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.731E-04	2.132E-04	1.332E-02	3.198E-01	6.040E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.883E-05	1.954E-04	2.487E-04	6.751E-05	3.731E-04

Methodology is the same as previous page.

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
Welding and Thermal Cutting

Company Name: Forest River, Inc., Glaval Bus Division
Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
Permit Number: 039-28511-00126
Reviewer: Jillian Bertram
Date: 10/9/2009

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	51	0.21	0.0055	0.0005			0.059	0.005	0.000	0	0.005
							EMISSIONS (tons/yr)				HAPS (tons/yr)
							0.258	0.023	0.000	0.000	0.023

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
 Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 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.

Appendix A: Emissions Calculations

Source-wide Summary

Company Name: Forest River, Inc., Glaval Bus Division
 Address City IN Zip: 55135 CR 1 and 914 CR 1, Elkhart, IN 46514
 Permit Number: 039-28511-00126
 Reviewer: Jillian Bertram
 Date: 10/9/2009

Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	Single HAP (tons/yr)	Total HAP (tons/yr)
Plant 1									
Bus Paint - 1	0.75	0.75	0.75	0.00	6.59	0.00	0.00	1.38 - xylene	3.04
Trailer Paint - 1	3.86	3.86	3.86	0.00	7.61	0.00	0.00	5.53 - xylene	5.53
Space Heaters	0.34	1.35	1.35	0.11	0.98	14.92	17.77	0.32 - hexane	0.34
Welding	0.26	0.26	0.26	0.00	0.00	0.00	0.00	0.02 - manganese	0.02
Plant 9									
Roll Coater 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bead Application 1 and 2	0.00	0.00	0.00	0.00	1.35	0.00	0.00	0.00	0.00
Bus Assembly 1	0.46	0.46	0.46	0.00	8.01	0.00	0.00	1.70 - xylene	2.65
B and C Assembly Area	0.70	0.70	0.70	0.00	23.42	0.00	0.00	3.42 - glycol ethers	8.18
Total	6.37	7.38	7.38	0.11	47.96	14.92	17.77	9.00 - xylene	19.76



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: William Conway
Chief Corporate Engineer
Forest River, Inc. - Glaval Bus Division
PO Box 3030
Elkhart IN 46515

DATE: Dec. 18, 2009

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

SUBJECT: Final Decision
MSOP Renewal
039-28511-00126

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:
Bill MacDonald DECA Environmental & Assoc. Inc.
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Dec. 18, 2009

TO: Elkhart Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Forest River, Inc. - Glaval Bus Division
Permit Number: 039-28511-00126

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	BMILLER 12/18/2009 Forest River, Inc. - Glaval Bus Division 039-28511-00126 (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	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		William Conway Chief Corporate Engineer Forest River, Inc. - Glaval Bus Division PO Box 3030 Elkhart IN 46515-3030 (Source CAATS) <i>Via Confirmed Delivery</i>									
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		Elkhart County Public Library 3429 E. Bristol St. Elkhart In 46516 (Library)									
7		Mr. Bill MacDonald DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)									
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