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

*Mitchell E. Daniels Jr.*
**Governor**

*Thomas W. Easterly*
**Commissioner**

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

TO: Interested Parties / Applicant

DATE: July 19, 2011

RE: Forest River Inc., Prime Time Manufacturing Division / 039-30206-00590

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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# Minor Source Operating Permit
# OFFICE OF AIR QUALITY

## Forest River Inc., Prime Time Manufacturing Division
## 66149 SR 19
## Wakarusa, Indiana 46573

(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.: M039-30206-00590 | |
|---|---|
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: July 19, 2011<br><br>Expiration Date: July 19, 2016 |

## TABLE OF CONTENTS

**A. SOURCE SUMMARY ..... 4**
- A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

**B. GENERAL CONDITIONS ..... 5**
- B.1 Definitions [326 IAC 2-1.1-1]
- B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability
- B.5 Severability
- B.6 Property Rights or Exclusive Privilege
- B.7 Duty to Provide Information
- B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
- B.12 Permit Renewal [326 IAC 2-6.1-7]
- B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
- B.14 Source Modification Requirement
- B.15 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]
- B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
- B.17 Annual Fee Payment [326 IAC 2-1.1-7]
- B.18 Credible Evidence [326 IAC 1-1-6]

**C. SOURCE OPERATION CONDITIONS ..... 10**

**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]
- C.2 Permit Revocation [326 IAC 2-1.1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**
- C.9 Performance Testing [326 IAC 3-6]

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

**Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**
- C.11 Compliance Monitoring [326 IAC 2-1.1-11]
- C.12 Instrument Specifications [326 IAC 2-1.1-11]

**Corrective Actions and Response Steps**
- C.13 Response to Excursions or Exceedances
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**
C.15 Malfunctions Report [326 IAC 1-6-2]
C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

**D.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 16**

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**
D.1.1 Particulate Matter (PM), PM10, and PM2.5 PSD Minor Limits [326 IAC 2-2]
D.1.2 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-2-9]
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.1.4 Particulate [326 IAC 6-3-2]
D.1.5 Preventive Maintenance Plan [326 IAC 2-5.5-4]

**Compliance Determination Requirements**
D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]
D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.1.8 Particulate Control

**Compliance Monitoring Requirements [326 IAC 2 6.1 5(a)(2)]**
D.1.9 Dust Collector Inspections

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**
D.1.10 Record Keeping Requirement

Annual Notification ..... 20
Malfunction Report ..... 21

## 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 motor home and travel trailer manufacturing.

| | |
|---|---|
| Source Address: | 66149 SR 19, Wakarusa, Indiana 46573 |
| General Source Phone Number: | (574) 534-6913 |
| SIC Code: | 3792 |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

Forest River, Inc.'s Primetime Division plant (source ID 039-00590) and Forest River Housing, Inc. (source ID 039-00611) are two (2) separate sources.

### A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) RV production line, identified as EU-1, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(b) One (1) RV production line, identified as EU-2, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(c) One (1) lamination line, identified as EU-6, constructed in 2004, using flow coating applicator, with a maximum capacity of 1.25 metal trailers per hour, using no controls and exhausting to stack V-01.

(d) Two (2) woodworking operations, identified as EU-3 and EU-4, constructed in 2004, with a maximum capacity of 500 pounds of wood per hour, using dust collectors for particulate control and exhausting inside.

(e) Natural gas-fired combustion sources, identified as EU-5, constructed in 2004, rated at 3.2 MMBtu/hour total, using no controls and exhausting inside.

## SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M039-30206-00590, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 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, Indiana 46204-2251

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

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

The Permittee shall implement the PMPs.

(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.

(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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M039-30206-00590 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.11 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.12 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 an affirmation that the statements in the application are true and complete 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 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.16 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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than 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.18 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 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.

(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.9 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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.10 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.11 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.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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

(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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) 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.

**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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) One (1) RV production line, identified as EU-1, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(b) One (1) RV production line, identified as EU-2, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(c) One (1) lamination line, identified as EU-6, constructed in 2004, using flow coating applicator, with a maximum capacity of 1.25 metal trailers per hour, using no controls and exhausting to stack V-01.

(d) Two (2) woodworking operations, identified as EU-3 and EU-4, constructed in 2004, with a maximum capacity of 500 pounds of wood per hour, using dust collectors for particulate control and exhausting inside.

(e) Natural gas-fired combustion sources, identified as EU-5, constructed in 2004, rated at 3.2 MMBtu/hour total, using no controls and exhausting inside.

(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 Matter (PM), PM10, and PM2.5 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following limits:

(a) PM emissions from the two (2) woodworking operations, identified as EU-3 and EU-4, shall not exceed 56.83 pounds per hour.

(b) PM10 emissions from the two (2) woodworking operations, identified as EU-3 and EU-4, shall not exceed 22.6 pounds per hour.

(c) PM2.5 emissions from the two (2) woodworking operations, identified as EU-3 and EU-4, shall not exceed 22.6 pounds per hour.

Compliance with these limitations, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

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

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators when coating metal at the two (2) RV assembly lines, identified as EU-01 and EU-2, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings, each.

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for

coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the two (2) RV Production Lines, identified as EU-01 and EU-2, shall utilize one of the following application methods:

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

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

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations, identified as EU-3 and EU-4 shall not exceed 6.12 pounds per hour, each, when operating at a process weight rate of 1.82 tons per hour.

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

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

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

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

P = (5,800 lbs/trailer)*(0.625 trailers/hour)*(1 ton/2000 lb)

D.1.5 Preventive Maintenance Plan [326 IAC 2-5.5-4]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC limitations 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 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.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

D.1.8 Particulate Control

In order to comply with Conditions D.1.1 and D.1.4, the dust collectors shall be in operation and control emissions from woodworking operations (EU-3 and EU-4) at all times that woodworking operations (EU-3 and EU-4) are in operation.

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

D.1.9 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all dust collectors controlling the woodworking operations (EU-3 and EU-4). All defective dust collectors shall be replaced.

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.2.

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

(2) The amount of coating material and solvent less water used on daily basis;

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

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

(3) The volume weighted average VOC content of the coatings used for each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.2, then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day;

(4) The cleanup solvent usage for each day; and

(5) The total VOC usage for each day.

(b) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

**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., Prime Time Manufacturing Division |
| **Address:** | 66149 SR 19 |
| **City:** | Wakarusa, Indiana 46573 |
| **Phone #:** | (574) 534-6913 |
| **MSOP #:** | M039-30206-00590 |

I hereby certify that Forest River Inc., Prime Time Manufacturing Division is :

□ still in operation.

□ no longer in operation.

I hereby certify that Forest River Inc., Prime Time Manufacturing Division is :

□ in compliance with the requirements of MSOP M039-30206-00590.

□ not in compliance with the requirements of MSOP M039-30206-00590.

| |
|---|
| **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
## COMPLIANCE AND ENFORCEMENT BRANCH
**FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

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

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

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

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

_____
_____

# Indiana Department of Environmental Management
# Office of Air Quality

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

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Source Location:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **County:** | **Elkhart** |
| **SIC Code:** | **3792** |
| **Operation Permit No.:** | **M039-30206-00590** |
| **Permit Reviewer:** | **Bruce Farrar** |

On June 15, 2011, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Forest River Inc., Prime Time Manufacturing Division had applied for a Minor Source Operating Permit to the transition of a SSOA to a MSOP due to increase in production. There are no new emission units involved in this transition. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

**Additional Changes**

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

(a) Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO2 equivalent emissions (CO2e). Therefore, CO2e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO2e per year (see summary table below and ATSD Appendix A for more detailed calculations). This did not require any changes to the permit.

...

Permit Level Determination – MSOP

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

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 15.22 |
| PM10[(1)] | 15.30 |
| PM2.5 | 15.30 |
| $SO_2$ | 0.01 |
| $NO_x$ | 1.40 |
| VOC | 45.43 |
| CO | 1.18 |
| **GHGs as $CO_2e$** | **1692** |

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

...

**(c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of $CO_2$ equivalent emissions ($CO_2e$) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.**

## IDEM Contact

(a) Questions regarding this proposed Minor Source Operating Permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.

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

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

**Appendix A: Emissions Calculations**
**Summary**

**Company Name:** **Forest River Inc., Prime Time Manufacturing Division**
**Address City IN Zip:** **66149 SR 19, Wakarusa, Indiana 46573**
**FESOP No:** **M039-30206-00590**
**Plt ID:** **039-00590**
**Permit Reviewer:** **Bruce Farrar**
**Date:** **February 11, 2011**

| | PM | PM10[1] | PM2.5[1] | $SO_2$ | NOx | VOC | CO | **CO2e** | Total HAPs |
|---|---|---|---|---|---|---|---|---|---|
| RV Production Lines (EU-1 and EU-2) | 0.22 | 0.22 | 0.22 | 0.01 | - | 45.35 | - | - | 2.35 |
| Lamination (EU-6) | - | - | - | - | - | 0.002 | - | - | 0.002 |
| Woodworking (EU-3 and EU-4)[2] | 14.98 | 14.98 | 14.98 | - | - | - | - | - | - |
| Combustion (EU-5) | 0.03 | 0.11 | 0.11 | 0.01 | 1.40 | 0.077 | 1.18 | 1692 | 0.026 |
| **Totals** | **15.22** | **15.30** | **15.30** | **0.01** | **1.40** | **45.43** | **1.18** | **1692** | **2.38** |

1. Assume PM=PM10 =PM2.5

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

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From RV Production Lines EU-1 and EU-2**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Thinner | 6.67 | 87.0% | 0.0% | 87.0% | 0.0% | 0.00% | 0.0234 | 1.250 | 5.80 | 5.80 | 0.17 | 4.07 | 0.74 | 0.00 | 100% |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.1% | 0.0% | 0.1% | 0.0% | 0.00% | 0.5000 | 1.250 | 0.01 | 0.01 | 0.00 | 0.11 | 0.02 | 0.00 | 100% |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Ifs Dura Pur Roll Cleaner | 8.34 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.0048 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Tremco 614,644 | 13.01 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Isopropyl Alcohol | 6.71 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0416 | 1.250 | 6.71 | 6.71 | 0.35 | 8.37 | 1.53 | 0.00 | 100% |
| Henkel Mb44 | 9.50 | 0.5% | 0.0% | 0.5% | 0.0% | 0.00% | 0.0546 | 1.250 | 0.05 | 0.05 | 0.00 | 0.08 | 0.01 | 0.00 | 100% |
| Ppg Dca468 High Performance Clear | 7.88 | 71.7% | 0.0% | 71.7% | 0.0% | 0.00% | 0.0156 | 1.250 | 5.65 | 5.65 | 0.11 | 2.64 | 0.48 | 0.05 | 75% |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 78.0% | 0.0% | 78.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 6.17 | 6.17 | 0.12 | 2.89 | 0.53 | 0.04 | 75% |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 6.94 | 6.94 | 0.14 | 3.25 | 0.59 | 0.00 | 100% |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 55.0% | 0.0% | 55.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 3.41 | 3.41 | 1.07 | 25.58 | 4.67 | 0.00 | 100% |
| Ppg Jt501 General Purpose Solvent | 6.90 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0048 | 1.250 | 6.90 | 6.90 | 0.04 | 0.99 | 0.18 | 0.00 | 100% |
| Dicor 502lsd | 9.96 | 31.1% | 0.0% | 31.1% | 0.0% | 0.00% | 0.8040 | 1.250 | 3.10 | 3.10 | 3.12 | 74.77 | 13.65 | 0.00 | 100% |
| Dicor 551 Lsd | 9.92 | 30.6% | 0.0% | 30.6% | 0.0% | 0.00% | 0.0804 | 1.250 | 3.04 | 3.04 | 0.31 | 7.33 | 1.34 | 0.00 | 100% |
| Dicor 905ba Adhesive | 8.60 | 44.0% | 0.0% | 44.0% | 0.0% | 0.00% | 1.0000 | 1.250 | 3.78 | 3.78 | 4.73 | 113.40 | 20.70 | 0.00 | 100% |
| Ppg D8753 Ez Blend | 7.26 | 97.0% | 0.0% | 97.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 7.04 | 7.04 | 0.14 | 3.29 | 0.60 | 0.00 | 75% |
| Fiberglass Evercoat | 9.60 | 37.9% | 0.0% | 37.9% | 0.0% | 0.00% | 0.0156 | 1.250 | 3.64 | 3.64 | 0.07 | 1.70 | 0.31 | 0.13 | 75% |
| **State Potential Emissions** | | | | | | | | | | | **10.35** | **248.48** | **45.35** | **0.22** | |

**METHODOLOGY:**

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

**Appendix A: Emission Calculations**
**HAP Emission Calculations**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Permit Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % MEK | Weight % Benzene | Weight % Ethyl-Benzene | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MEK Emissions (ton/yr) | Benzene Emissions (ton/yr) | Ethyl-Benzene Emissions (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Ppg Dtl16 Lacquer Thinner | 6.67 | 0.0234 | 1.250 | 30.00% | 30.00% | 20.00% | 1.00% | 0.00% | 0.26 | 0.26 | 0.17 | 0.01 | 0.00 |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.5000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cleaner | 8.34 | 0.0048 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tremco 614,644 | 13.01 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Isopropyl Alcohol | 6.71 | 0.0416 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Henkel Mb44 | 9.50 | 0.0546 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg Dca468 High Performance Clear | 7.88 | 0.0156 | 1.250 | 0.00% | 50.00% | 0.00% | 0.00% | 1.00% | 0.00 | 0.34 | 0.00 | 0.00 | 0.01 |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 0.0156 | 1.250 | 5.00% | 70.00% | 0.00% | 0.00% | 1.00% | 0.03 | 0.47 | 0.00 | 0.00 | 0.01 |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 0.0156 | 1.250 | 70.00% | 0.00% | 0.00% | 0.00% | 13.00% | 0.41 | 0.00 | 0.00 | 0.00 | 0.08 |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg Jt501 General Purpose Solvent | 6.90 | 0.0048 | 1.250 | 0.00% | 70.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.13 | 0.00 | 0.00 | 0.00 |
| Dicor 502lsd | 9.96 | 0.8040 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dicor 551 Lsd | 9.92 | 0.0804 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dicor 905ba Adhesive | 8.60 | 1.0000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg D8753 Ez Blend | 7.26 | 0.0156 | 1.250 | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.19 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fiberglass Evercoat | 9.60 | 0.0156 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total State Potential Emissions | | | | | | | | | **0.89** | **1.19** | **0.17** | **0.01** | **0.09** |

**METHODOLOGY**

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

**Appendix A: Emission Calculations**
**VOC from Lamination Line EU-6**

| | |
|---|---|
| **Company Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Address City IN Zip:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **MSOP Renewal No.** | **M039-30206-00590** |
| **Plt ID:** | **039-00590** |
| **Reviewer:** | **Bruce Farrar** |
| **Date:** | **February 11, 2011** |

**Reaction:**
**30% MDI + 70% PMDI + Water ----> 100% PMDI + Water + heat**

Assume all VOC is MDI

| | | |
|---|---|---|
| W = | 1.68077E-05 | Evaporation rate grams/second |
| W = | 1.331E-04 | Evaporation rate pounds/hour |

| | | |
|---|---|---|
| 3.75 panels per hour * W = | 4.992E-04 | VOC/HAP pounds/hour |
| hourly emissions * (8760 hours/year * (1 ton/2000 lbs)= | 2.186E-03 | VOC/HAP tons/year |

Assume all MDI is lost without reaction:

**METHODOLOGY**
The evaporation rate was determined using an equation developed by the Society of Plastic Industry (see TSD for more detail).

This methodolgy was used to determine the evaporation rate for a similar lamination process located at the Forest River, Inc. Millersburg facility (OAQ Permit #039-26183-00471, issued July 8, 2008).
$W = ((25.4)*(Pt^{o})*(MT)*(\mu^{0.78})*(A))/T$

W = evaporation rate in grams/second)
$Pt^{o}$ = liquid vapor pressure in atmospheres 1.31E-5mmHg * (1atm/760mmHg = 1.72-8 atm)
MT = average molecular weight (MDI = 250)
T = temperature in degrees Kelvin (K° = (80°F - 32°F)*(5/9) +273 = 299)
μ = air speed across the curing adhesive in m/seconds (3 meters/second^$^{0.78}$ = 2.356)
A = exposed area in square meters ((30ft*7ft)* 0.093 $m^2/ft^2$ = 19.53 $m^2$ )

evaporation rate = emission factor
Assume all VOC is MDI and VOC = HAP

VOC lbs/hr = VOC emission factor * panels per hour
VOC tons/yr = VOC lbs/hr * (8760 hrs/1yr) * (1 ton/2000 lbs)

Page 5 of 9 ATSD App A

**Appendix A: Emissions Calculations**
**Woodworking Operations EU-3 and Eu-4**

| | |
|---|---|
| **Company Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Address City IN Zip:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **Permit Number:** | **M039-30206-00590** |
| **Plt No:** | **039-00590** |
| **Reviewer:** | **Bruce Farrar** |
| **Date:** | **February 11, 2011** |

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

| | | |
|---|---|---|
| Amount Collected | 1.71 | lb/unit/hr |
| Hours | 8760 | hr/yr |
| Efficiency | 95.00% | |

| | | |
|---|---|---|
| Uncontrolled Emissions = | 299.59 | tons/yr |
| Controlled Emissions = | 14.98 | tons/yr |

**Methodology**

Uncontrolled Emissions = Amount Collected (lb/unit/hr) * 2 units * Hours (hours/yr)/ 2000 (lbs/ton) / Efficiency (%)

Controlled Emissions = Amount Collected (lb/unit/hr) * 2 units * Hours (hours/yr)/ 2000 (lbs/ton)

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only (EU-5)**
**MM BTU/HR <100**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Heat Input Capacity MMBtu/hr | HHV mmBtu / mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 3.2 | 1000 | 28.0 |

| | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.027 | 0.107 | 0.008 | 1.402 | 0.077 | 1.177 |

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

**Methodology**

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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only (EU-5)**
**MM BTU/HR <100**
**HAPs Emissions**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 2.943E-05 | 1.682E-05 | 1.051E-03 | 2.523E-02 | 4.765E-05 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 7.008E-06 | 1.542E-05 | 1.962E-05 | 5.326E-06 | 2.943E-05 |

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 8 for Greenhouse Gas calculations.

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

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** July 18, 2011

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 1,682 | 0.0 | 0.0 |
| Summed Potential Emissions in tons/yr | 1,682 | | |
| CO2e Total in tons/yr | 1,692 | | |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations**
**Daily Volume-Weighted Average**
**For EU-1 and EU-2**

**Company Name:** **Forest River Inc., Prime Time Manufacturing Division**
**Registration:** **66149 SR 19, Wakarusa, Indiana 46573**
**Permit Number:** **M039-30206-00590**
**Plt ID:** **039-00590**
**Reviewer:** **Bruce Farrar**
**Date:** **February 11, 2011**

| Material | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Σ(C*U) | S U | A = [S (C x U) / S U] |
|---|---|---|---|---|---|---|
| **RV Production Line EU- and EU-2** | | | | | | |
| Ppg Dtl16 Lacquer Thinner | 6.67 | 0.625 | 5.8 | 580.29 | 100.05 | |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.625 | 0.007 | 0.88 | 126.30 | |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.625 | 0 | 0.00 | 125.55 | |
| Ifs Dura Pur Roll Cleaner | 8.34 | 0.625 | 0 | 0.00 | 125.10 | |
| Tremco 614,644 | 13.01 | 0.625 | 0 | 0.00 | 195.15 | |
| Isopropyl Alcohol | 6.71 | 0.625 | 6.71 | 675.36 | 100.65 | |
| Henkel Mb44 | 9.50 | 0.625 | 5.00% | 7.13 | 142.50 | |
| High Performance Clear | 7.88 | 0.625 | 5.65 | 667.83 | 118.20 | |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 0.625 | 6.17 | 732.07 | 118.65 | |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 0.625 | 6.94 | 722.45 | 104.10 | |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 0.625 | 3.41 | 317.13 | 93.00 | |
| Ppg Jt501 General Purpose Solvent | 6.90 | 0.625 | 6.90 | 714.15 | 103.50 | |
| Dicor 502lsd | 9.96 | 1.25 | 3.10 | 926.28 | 298.80 | |
| Dicor 551 Lsd | 9.92 | 1.25 | 3.04 | 904.70 | 297.60 | |
| Dicor 905ba Adhesive | 8.60 | 1.25 | 3.78 | 975.24 | 258.00 | |
| Ppg D8753 Ez Blend | 7.26 | 1.25 | 7.04 | 1532.26 | 217.65 | |
| Fiberglass Evercoat | 9.60 | 1.25 | 3.64 | 1048.32 | 288.00 | |
| | | | | 9804.10 | 2812.80 | **3.486** |

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a SSOA to a Minor Source Operating Permit (MSOP)

### Source Description and Location

| | |
|---|---|
| **Source Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Source Location:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **County:** | **Elkhart** |
| **SIC Code:** | **3792** |
| **Operation Permit No.:** | **M039-30206-00590** |
| **Permit Reviewer:** | **Bruce Farrar** |

On February 11, 2011, the Office of Air Quality (OAQ) received an application from Forest River Inc., Prime Time Manufacturing Division related to the transition of a SSOA to a MSOP due to increase in production. There are no new emission units involved in this transition.

### Source Definition

Forest River, Inc.'s Primetime Division plant (source ID 039-00590) is located 0.6 miles from Forest River Housing, Inc. (source ID 039-00611). Forest River has many other plants in Elkhart County, but they are all more than five miles from the Lifetime Division plant. IDEM, OAQ has examined whether the Lifetime Division plant and the Housing 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 plants 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. The Lifetime Division plant has a two-digit SIC code of 37, whereas the Housing plant has a two-digit SIC code of 24. A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Neither Forest River plant provides any output to the other plant. The plants do not meet the second part of the source definition. Therefore, the 2 plants are considered 2 separate sources. This determination was initially made under SSOA No. 039-28354-00590, issued on September 4, 2009.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) SSOA 2nd Administrative Amendment No. 039-28460-00590, issued on September 21, 2009.

(b) SSOA 1st Administrative Amendment No. 039-28354-00590, issued on September 4, 2009.

(c) SSOA No. 039-18523-00590, issued on January 5, 2004.

Due to this application, the source is transitioning from a SSOA to a MSOP. The source anticipates an increase in production and has requested to become a MSOP.

## County Attainment Status

The source is located in Elkhart County.

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

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

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 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 $PM_{2.5}$ 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 pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## Fugitive Emissions

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

(b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

## Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River Inc., Prime Time Manufacturing Division on February 11, 2011, relating to the transition from a SSOA to a MSOP. Forest River Inc., Prime Time Manufacturing Division has requested this change based on an anticipated increase in production.

The source consists of the following permitted emission units:

(a) One (1) RV production line, identified as EU-1, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(b) One (1) RV production line, identified as EU-2, constructed in 2004, using roll, brush and airless spray coating to metal parts and wooden cabinets,, with a maximum capacity of 0.625 metal trailers per hour, using no controls and exhausting inside.

(c) One (1) lamination line, identified as EU-6, constructed in 2004, using flow coating applicator, with a maximum capacity of 1.25 metal trailers per hour, using no controls and exhausting to stack V-01.

(d) Two (2) woodworking operations, identified as EU-3 and EU-4, constructed in 2004, with a maximum capacity of 500 pounds of wood per hour, using dust collectors for particulate control and exhausting inside.

(e) Natural gas-fired combustion sources, identified as EU-5, constructed in 2004, rated at 3.2 MMBtu/hour total, using no controls and exhausting inside.

## Enforcement Issues

There are no pending enforcement actions related to this source.

## Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

The lamination line uses two (2) chemicals for the lamination process.

(a) Termolock LHM7749 is a solid industrial hot melt adhesive containing no VOCs or HAPs.

(b) Macroplast SIA-116 is a single component, solvent free, moisture curable, liquid polyurethane adhesive. It cures with water. It contains up to 30% of Methylenebis (phenylisocyanate) (MDI) (CAS 101-68-8) which is a VOC and HAP.

Macroplast SIA-116 does not act like a unitary coating. A unitary coating is a resin dissolved in a "vehicle" which is generally a mixture of solvents - usually aromatics such as toluene, xylene, and ethyl benzene. With a unitary coating the "vehicle" flashes off leaving a layer of resin which then partially oxidizes to form a resistant coating. Macroplast SIA-116 adhesive is a moisture cured urethane adhesive which cures when exposed to water. As the adhesive is applied, it absorbs moisture from the air to catalyze the MDI/PMDI mixture. Forest River, Inc. Bead Laminators mix water directly into the adhesive immediately prior to application in order to promote rapid polymerization. With the direct water mixing, the adhesive can be expected to be essentially polymerized to completion within two minutes. The chemical reaction is expressed as:

30% MDI + 70% PMDI + $H_2O$ ----> 100% PMDI + $H_2O$ + heat

Evaporation of unreacted MDI can only take place during the interval between application of the adhesive from its container and the point at which it is completely reacted - in this case about 2 minutes (0.033 hr).

Using the engineering calculations provided by the Society of Plastic Industry, the emissions are calculated as follows:

- The largest panel that can be handled by the press is 30' x 7' (19.5 m2)
- Maximum production 4.5 panels per hour (1560 m2/hr)
- "Tack free" temperature is 80 F
- "Tack free" time is 120 seconds

Note: "Tack free time is the time until no more unreacted MDI is present in the adhesive. "Tack free" temperature is the temperature of the adhesive when all the MDI has reacted. "Tack free" time determines the production rate. Air speed across the coated surfaces is 3 meters/sec.

From the emission calculation published by the Society of the Plastics Industry:

$$W = \frac{(25.4)\,(PT^{o})(MT)(\mu^{0.78})(A)}{T}$$

Where:

W is the evaporation rate in grams/second
$PT^{o}$ is the liquid vapor pressure in atmospheres
MT is the average molecular weight (for MDI=250)
T is the temperature in degrees Kelvin
μ is the air speed across the curing adhesive in m/sec
A is exposed area in square meters

**Permit Level Determination – MSOP**

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

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 15.22 |
| PM10(1) | 15.30 |
| PM2.5 | 15.30 |
| $SO_2$ | 0.01 |
| $NO_x$ | 1.40 |
| VOC | 45.43 |
| CO | 1.18 |

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

| HAPs | Potential To Emit (tons/year) |
|---|---|
| Toluene | 1.19 |
| Xylene | 0.89 |
| MEK | 0.17 |
| Ethyl-Benzene | 0.09 |
| Hexane | 0.025 |
| Benzene | 0.01 |
| MDI | 0.002 |
| **TOTAL HAPs** | **2.38** |

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC is each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

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

| | PM | PM10[1] | PM2.5[1] | $SO_2$ | NOx | VOC | CO | Total HAPs | Worst Single HAP |
|---|---|---|---|---|---|---|---|---|---|
| RV Production Lines (EU-1 and EU-2) | 0.22 | 0.22 | 0.22 | 0.01 | - | 45.35 | - | 2.35 | 1.19 Toluene |
| Lamination (EU-6) | - | - | - | - | - | 0.002 | - | 0.002 | 0.002 MDI |
| Woodworking (EU-3 and EU-4)[2] | 14.98 | 14.98 | 14.98 | - | - | - | - | - | |
| Combustion (EU-5) | 0.03 | 0.11 | 0.11 | 0.01 | 1.40 | 0.077 | 1.18 | 0.026 | 0.025 Hexane |
| **Totals** | **15.22** | **15.30** | **15.30** | **0.01** | **1.40** | **45.43** | **1.18** | **2.38** | |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| Source Thresholds | 250 | 250 | N/A | 250 | 250 | 250 | 250 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | 100 | NA | NA | NA | NA | NA | NA |

1. PM10 = PM2.5
2. In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility, and therefore, potential emissions were to be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls. The PTE before control is greater than 250 tons/year.

PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM10 and PM2.5 is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Note: Limit to render 326 IAC 2-2 not applicable is based on the PTE before control. Since the Woodworking PTE before control is greater than 250 tons/year, therefore it is necessary to specify PM, PM10 and PM2.5 limits to render 326 IAC 2-2 not applicable.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

(a) PM emissions shall not exceed 56.83 pounds per hour.

(b) PM10 emissions shall not exceed 22.6 pounds per hour.

(c) PM2.5 emissions shall not exceed 22.6 pounds per hour.

The dust collectors shall be in operation at all times the woodworking operation (EU-3 and EU-4) is in operation.

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

## Federal Rule Applicability Determination

NSPS

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

NESHAP

(a) The requirements of the Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 Subpart MM (2M)), are not included in this permit, because this source's is not an automobile or light-duty truck assembly plant.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included in this permit, because this source is not a major source for HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63.4480 Subpart PPPP (4P)) are not included in this permit because the source is not a major source of Hazardous Air Pollutants (HAPs).

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), are not included in this permit, because the source does not operate a paint stripping operation, autobody refinishing operation, or a spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included in this permit, because this source's SIC is not listed.

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

Compliance Assurance Monitoring (CAM)

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

## State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

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

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

RV Production Lines EU-1 and EU-2

The two (2) RV Production Lines, identified as EU-1 and EU-2 are capable of coating metal parts and wooden cabinets.

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The two (2) RV Production Lines, identified as EU-1 and EU-2, uses roll or brush coating, therefore, pursuant to 326 IAC 6-3-1(b)(6) and (8), 326 IAC 6-3-2 does not apply to the production operation.

(h) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The two (2) RV Production Lines, identified as EU-1 and EU-2, performs a metal coating and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and the production operation has actual VOC emissions greater than 15 pounds per day. Therefore, the production operation is subject to 326 IAC 8-2-9 and has the following requirements:

The VOC content of the coatings applied to this facility shall not exceed three and five tenths (3.5) pounds VOC per gallon of extreme performance coatings, excluding water, delivered to the applicators.

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

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

Where:

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

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

(i) 326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)
The two (2) RV Production Lines, identified as EU-1 and EU-2, perform surface coating of wood furniture or cabinets, the source was constructed after July 1, 1990 and the production operation has actual VOC emissions greater than 15 pounds per day. Therefore the requirements of 326 IAC 8-2-12 are applicable this source.

Pursuant to 326 IAC 8-2-12, an owner or operator of a wood furniture or cabinet coating operation subject to this section shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

| | |
|---|---|
| Airless Spray Application | Air-Assisted Airless Spray Application |
| Electrostatic Spray Application | Electrostatic Bell or Disc Application |
| Heated Airless Spray Application | Roller Coating |
| Brush or Wipe Application | Dip-and-drain Application |

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
The two (2) RV Production Lines, EU-1 and EU-2, apply coatings with roller, brush, and wipe methods of application. Therefore, The two (2) RV Production Lines, EU-01 and EU-02, can comply with the requirements of 326 IAC 8-2-12.

(j) There are no other 326 IAC 8 Rules that are applicable to these units.

Woodworking Operation EU-3 and EU-4

(k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation, identified as EU-3 and EU-4, shall not exceed 6.12 pounds per hour when operating at a process weight rate of 1.82 tons per hour (5,800 lb/trailer * 0.625 trailers per hour)*(1 ton/2000 lb)).

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

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

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

The dust collectors shall be in operation at all times the woodworking operation (EU-3 and EU-4) are in operation.

(l) There are no other 326 IAC 8 Rules that are applicable to the unit.

Lamination Line EU-6

(m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The lamination line, identified as L-1, uses flow coating as an applicator, therefore, pursuant to 326 IAC 6-3-1(b)(7), 326 IAC 6-3-2 does not apply to the lamination line.

(n) 326 IAC 8-2 (Surface Coating Emission Limitations)
The lamination line, identified as L-1, is not subject to the requirements of 326 IAC 8-2, because the lamination line does not have potential emissions of greater than fifteen (15) pounds of VOC per day before add on controls.

(o) There are no other 326 IAC 8 Rules that are applicable to the lamination line.

Natural Gas Fired Combustion

(p) 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The gas-fired units are not subject to 326 IAC 6-2-1, since they are not sources of indirect heating.

(q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The insignificant natural gas-fired units are exempt from the requirements of 326 IAC 6-3-2, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

## Compliance Determination, Monitoring and Testing Requirements

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

| Emission Unit | Operating Parameters | Frequency |
|---|---|---|
| Woodworking/EU-3 and EU-4 (baghouse) | baghouse inspection | Quarterly |

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

## Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 11, 2011.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-30206-00590. The staff recommends to the Commissioner that this MSOP be approved.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.

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

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

**Appendix A: Emissions Calculations**
**Summary**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**FESOP No:** M039-30206-00590
**Plt ID:** 039-00590
**Permit Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| | PM | PM10[1] | PM2.5[1] | $SO_2$ | NOx | VOC | CO | Total HAPs | Worst Single HAP |
|---|---|---|---|---|---|---|---|---|---|
| RV Production Lines (EU-1 and EU-2) | 0.22 | 0.22 | 0.22 | 0.01 | - | 45.35 | - | 2.35 | 1.19 Toluene |
| Lamination (EU-6) | - | - | - | - | - | 0.002 | - | 0.002 | 0.002 MDI |
| Woodworking (EU-3 and EU-4)[2] | 14.98 | 14.98 | 14.98 | - | - | - | - | - | |
| Combustion (EU-5) | 0.03 | 0.11 | 0.11 | 0.01 | 1.40 | 0.077 | 1.18 | 0.026 | 0.025 Hexane |
| **Totals** | **15.22** | **15.30** | **15.30** | **0.01** | **1.40** | **45.43** | **1.18** | **2.38** | |

1. Assume PM=PM10 =PM2.5

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

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From RV Production Lines EU-1 and EU-2**



**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Thinner | 6.67 | 87.0% | 0.0% | 87.0% | 0.0% | 0.00% | 0.0234 | 1.250 | 5.80 | 5.80 | 0.17 | 4.07 | 0.74 | 0.00 | 100% |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.1% | 0.0% | 0.1% | 0.0% | 0.00% | 0.5000 | 1.250 | 0.01 | 0.01 | 0.00 | 0.11 | 0.02 | 0.00 | 100% |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Ifs Dura Pur Roll Cleaner | 8.34 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.0048 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Tremco 614,644 | 13.01 | 0.0% | 0.0% | 0.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100% |
| Isopropyl Alcohol | 6.71 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0416 | 1.250 | 6.71 | 6.71 | 0.35 | 8.37 | 1.53 | 0.00 | 100% |
| Henkel Mb44 | 9.50 | 0.5% | 0.0% | 0.5% | 0.0% | 0.00% | 0.0546 | 1.250 | 0.05 | 0.05 | 0.00 | 0.08 | 0.01 | 0.00 | 100% |
| Ppg Dca468 High Performance Clear | 7.88 | 71.7% | 0.0% | 71.7% | 0.0% | 0.00% | 0.0156 | 1.250 | 5.65 | 5.65 | 0.11 | 2.64 | 0.48 | 0.05 | 75% |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 78.0% | 0.0% | 78.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 6.17 | 6.17 | 0.12 | 2.89 | 0.53 | 0.04 | 75% |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 6.94 | 6.94 | 0.14 | 3.25 | 0.59 | 0.00 | 100% |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 55.0% | 0.0% | 55.0% | 0.0% | 0.00% | 0.2500 | 1.250 | 3.41 | 3.41 | 1.07 | 25.58 | 4.67 | 0.00 | 100% |
| Ppg Jt501 General Purpose Solvent | 6.90 | 100.0% | 0.0% | 100.0% | 0.0% | 0.00% | 0.0048 | 1.250 | 6.90 | 6.90 | 0.04 | 0.99 | 0.18 | 0.00 | 100% |
| Dicor 502lsd | 9.96 | 31.1% | 0.0% | 31.1% | 0.0% | 0.00% | 0.8040 | 1.250 | 3.10 | 3.10 | 3.12 | 74.77 | 13.65 | 0.00 | 100% |
| Dicor 551 Lsd | 9.92 | 30.6% | 0.0% | 30.6% | 0.0% | 0.00% | 0.0804 | 1.250 | 3.04 | 3.04 | 0.31 | 7.33 | 1.34 | 0.00 | 100% |
| Dicor 905ba Adhesive | 8.60 | 44.0% | 0.0% | 44.0% | 0.0% | 0.00% | 1.0000 | 1.250 | 3.78 | 3.78 | 4.73 | 113.40 | 20.70 | 0.00 | 100% |
| Ppg D8753 Ez Blend | 7.26 | 97.0% | 0.0% | 97.0% | 0.0% | 0.00% | 0.0156 | 1.250 | 7.04 | 7.04 | 0.14 | 3.29 | 0.60 | 0.00 | 75% |
| Fiberglass Evercoat | 9.60 | 37.9% | 0.0% | 37.9% | 0.0% | 0.00% | 0.0156 | 1.250 | 3.64 | 3.64 | 0.07 | 1.70 | 0.31 | 0.13 | 75% |
| **State Potential Emissions** | | | | | | | | | | | **10.35** | **248.48** | **45.35** | **0.22** | |

**METHODOLOGY:**

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

**Appendix A: Emission Calculations**
**HAP Emission Calculations**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Permit Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % MEK | Weight % Benzene | Weight % Ethyl-Benzene | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MEK Emissions (ton/yr) | Benzene Emissions (ton/yr) | Ethyl-Benzene Emissions (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Ppg Dtl16 Lacquer Thinner | 6.67 | 0.0234 | 1.250 | 30.00% | 30.00% | 20.00% | 1.00% | 0.00% | 0.26 | 0.26 | 0.17 | 0.01 | 0.00 |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.5000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cleaner | 8.34 | 0.0048 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tremco 614,644 | 13.01 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Isopropyl Alcohol | 6.71 | 0.0416 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Henkel Mb44 | 9.50 | 0.0546 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg Dca468 High Performance Clear | 7.88 | 0.0156 | 1.250 | 0.00% | 50.00% | 0.00% | 0.00% | 1.00% | 0.00 | 0.34 | 0.00 | 0.00 | 0.01 |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 0.0156 | 1.250 | 5.00% | 70.00% | 0.00% | 0.00% | 1.00% | 0.03 | 0.47 | 0.00 | 0.00 | 0.01 |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 0.0156 | 1.250 | 70.00% | 0.00% | 0.00% | 0.00% | 13.00% | 0.41 | 0.00 | 0.00 | 0.00 | 0.08 |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 0.2500 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg Jt501 General Purpose Solvent | 6.90 | 0.0048 | 1.250 | 0.00% | 70.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.13 | 0.00 | 0.00 | 0.00 |
| Dicor 502lsd | 9.96 | 0.8040 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dicor 551 Lsd | 9.92 | 0.0804 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dicor 905ba Adhesive | 8.60 | 1.0000 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Ppg D8753 Ez Blend | 7.26 | 0.0156 | 1.250 | 30.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.19 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fiberglass Evercoat | 9.60 | 0.0156 | 1.250 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total State Potential Emissions | | | | | | | | | **0.89** | **1.19** | **0.17** | **0.01** | **0.09** |

**METHODOLOGY**

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

**Appendix A: Emission Calculations**
**VOC from Lamination Line EU-6**

| | |
|---|---|
| **Company Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Address City IN Zip:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **MSOP Renewal No.** | **M039-30206-00590** |
| **Plt ID:** | **039-00590** |
| **Reviewer:** | **Bruce Farrar** |
| **Date:** | **February 11, 2011** |

**Reaction:**
**30% MDI + 70% PMDI + Water ----> 100% PMDI + Water + heat**

Assume all VOC is MDI

| | | |
|---|---|---|
| W = | 1.68077E-05 | Evaporation rate grams/second |
| W = | 1.331E-04 | Evaporation rate pounds/hour |

| | | |
|---|---|---|
| 3.75 panels per hour * W = | 4.992E-04 | VOC/HAP pounds/hour |
| hourly emissions * (8760 hours/year * (1 ton/2000 lbs)= | 2.186E-03 | VOC/HAP tons/year |

Assume all MDI is lost without reaction:

**METHODOLOGY**
The evaporation rate was determined using an equation developed by the Society of Plastic Industry (see TSD for more detail).

This methodolgy was used to determine the evaporation rate for a similar lamination process located at the Forest River, Inc. Millersburg facility (OAQ Permit #039-26183-00471, issued July 8, 2008).
$W = ((25.4)*(Pt^{o})*(MT)*(\mu^{0.78})*(A))/T$

W = evaporation rate in grams/second)
$Pt^{o}$ = liquid vapor pressure in atmospheres 1.31E-5mmHg * (1atm/760mmHg = 1.72-8 atm)
MT = average molecular weight (MDI = 250)
T = temperature in degrees Kelvin (K° = (80°F - 32°F)*(5/9) +273 = 299)
μ = air speed across the curing adhesive in m/seconds (3 meters/second^$^{0.78}$ = 2.356)
A = exposed area in square meters ((30ft*7ft)* 0.093 $m^2/ft^2$ = 19.53 $m^2$ )

evaporation rate = emission factor
Assume all VOC is MDI and VOC = HAP

VOC lbs/hr = VOC emission factor * panels per hour
VOC tons/yr = VOC lbs/hr * (8760 hrs/1yr) * (1 ton/2000 lbs)

Page 5 of 8 TSD App A

**Appendix A: Emissions Calculations**
**Woodworking Operations EU-3 and Eu-4**

| | |
|---|---|
| **Company Name:** | **Forest River Inc., Prime Time Manufacturing Division** |
| **Address City IN Zip:** | **66149 SR 19, Wakarusa, Indiana 46573** |
| **Permit Number:** | **M039-30206-00590** |
| **Reviewer:** | **039-00590** |
| **Date:** | **Bruce Farrar** |
| | **February 11, 2011** |

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

| | | |
|---|---|---|
| Amount Collected | 1.71 | lb/unit/hr |
| Hours | 8760 | hr/yr |
| Efficiency | 95.00% | |

| | | |
|---|---|---|
| Uncontrolled Emissions = | 299.59 | tons/yr |
| Controlled Emissions = | 14.98 | tons/yr |

**Methodology**

Uncontrolled Emissions = Amount Collected (lb/unit/hr) * 2 units * Hours (hours/yr)/ 2000 (lbs/ton) / Efficiency (%)

Controlled Emissions = Amount Collected (lb/unit/hr) * 2 units * Hours (hours/yr)/ 2000 (lbs/ton)

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only (EU-5)**
**MM BTU/HR <100**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Heat Input Capacity MMBtu/hr | HHV mmBtu / mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 3.2 | 1000 | 28.0 |

| | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.027 | 0.107 | 0.008 | 1.402 | 0.077 | 1.177 |

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

**Methodology**

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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only (EU-5)**
**MM BTU/HR <100**
**HAPs Emissions**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Address City IN Zip:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 2.943E-05 | 1.682E-05 | 1.051E-03 | 2.523E-02 | 4.765E-05 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 7.008E-06 | 1.542E-05 | 1.962E-05 | 5.326E-06 | 2.943E-05 |

Methodology is the same as page 6.

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**
**Daily Volume-Weighted Average**
**For EU-1 and EU-2**

**Company Name:** Forest River Inc., Prime Time Manufacturing Division
**Registration:** 66149 SR 19, Wakarusa, Indiana 46573
**Permit Number:** M039-30206-00590
**Plt ID:** 039-00590
**Reviewer:** Bruce Farrar
**Date:** February 11, 2011

| Material | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Σ(C*U) | S U | A = [S (C x U) / S U] |
|---|---|---|---|---|---|---|
| **RV Production Line EU- and EU-2** | | | | | | |
| Ppg Dtl16 Lacquer Thinner | 6.67 | 0.625 | 5.8 | 580.29 | 100.05 | |
| Franklin 50667 Thin Spread Adhesive | 8.42 | 0.625 | 0.007 | 0.88 | 126.30 | |
| Tremco 645,650,651 (Any Color) | 8.37 | 0.625 | 0 | 0.00 | 125.55 | |
| Ifs Dura Pur Roll Cleaner | 8.34 | 0.625 | 0 | 0.00 | 125.10 | |
| Tremco 614,644 | 13.01 | 0.625 | 0 | 0.00 | 195.15 | |
| Isopropyl Alcohol | 6.71 | 0.625 | 6.71 | 675.36 | 100.65 | |
| Henkel Mb44 | 9.50 | 0.625 | 5.00% | 7.13 | 142.50 | |
| High Performance Clear | 7.88 | 0.625 | 5.65 | 667.83 | 118.20 | |
| Ppg Ddl1 Duracryl Acrylic Lacquer | 7.91 | 0.625 | 6.17 | 732.07 | 118.65 | |
| Ppg Dx440 Wax And Grease Remover | 6.94 | 0.625 | 6.94 | 722.45 | 104.10 | |
| NORTHSTAR ALL PURPOSE ADHESIVE (Super Stick) | 6.20 | 0.625 | 3.41 | 317.13 | 93.00 | |
| Ppg Jt501 General Purpose Solvent | 6.90 | 0.625 | 6.90 | 714.15 | 103.50 | |
| Dicor 502lsd | 9.96 | 1.25 | 3.10 | 926.28 | 298.80 | |
| Dicor 551 Lsd | 9.92 | 1.25 | 3.04 | 904.70 | 297.60 | |
| Dicor 905ba Adhesive | 8.60 | 1.25 | 3.78 | 975.24 | 258.00 | |
| Ppg D8753 Ez Blend | 7.26 | 1.25 | 7.04 | 1532.26 | 217.65 | |
| Fiberglass Evercoat | 9.60 | 1.25 | 3.64 | 1048.32 | 288.00 | |
| | | | | 9804.10 | 2812.80 | **3.486** |

**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
Forest River Inc., Prime Manufacturing Division
PO Box 3030
Elkhart, IN 46515

DATE: July 19, 2011

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

SUBJECT: Final Decision
Minor Source Operating Permit
039-30206-00590

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 & Associates, 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.

**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**

July 19, 2011

TO: Wakarusa 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. Prime Manufacturing Division**
**Permit Number:** **039-30206-00590**

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 | GHOTOPP 7/19/2011<br>Forest River Inc., Prime Time Mfg Division 039-30206-00590 Final | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | William Conway Forest River Inc., Prime Time Mfg Division PO Box 3030 Elkhart IN 46515-3030 (Source CAATS) via confirmed delivery | | | | | | | | | |
| 2 | | Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)* | | | | | | | | | |
| 3 | | Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)* | | | | | | | | | |
| 4 | | Wakarusa Town Council and Town Manager P.O. Box 474 Wakarusa IN 46573 *(Local Official)* | | | | | | | | | |
| 5 | | Wakarusa-Olive and Harrison Township 124 N Elkhart St. Box 485 Wakarusa IN 46573-0485 *(Library)* | | | | | | | | | |
| 6 | | Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)* | | | | | | | | | |
| 7 | | Mr. Bill MacDonald DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 *(Consultant)* | | | | | | | | | |
| 8 | | Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)* | | | | | | | | | |
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