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: May 1, 2012

RE: Cruiser RV, LLC / 087-31162-00080

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07

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New Source Construction and Minor Source Operating Permit
OFFICE OF AIR QUALITY

Cruiser RV, LLC
290 West Dutch Drive
LaGrange, Indiana 46761

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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.: M087-31162-00080	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 1, 2012 Expiration Date: May 1, 2017

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary recreational vehicle (RV) manufacturer.

Source Address:	290 West Dutch Drive, LaGrange, Indiana 46761
General Source Phone Number:	(260) 562-3500
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) surface coating booth, identified as PR1, approved for construction in 2012, using HVLP spray gun to coat a substrate of fiberglass, with a maximum capacity of 2.0 units per hour, using dry filters for particulate control, and exhausting to stack PBS1.

(b) One (1) assembly operation, identified as AO1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, wood, fabric and plastic, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(c) One (1) final finish operation, identified as FF1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, plastic and glass, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(d) One (1) touch-up paint area, identified as TUP1, approved for construction in 2012, using aerosol to coat a substrate of metal, with a maximum capacity of 0.5 units per hour, using no controls, and exhausting inside the building.

(e) One (1) woodworking area, identified as WW1, approved for construction in 2012, , with a maximum capacity of 5.13 tons of wood per hour, using an integral baghouse for particulate control, and exhausting to stack DC1.

(f) One (1) miscellaneous operation, approved for construction in 2012, using no controls, and exhausting inside the building, consisting of:

(1) Eight (8) PVC chop saws, identified as CS1 - CS8, with a maximum capacity of 50 cuts per hour of 3 inch diameter PVC pipe (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(2) Four (4) aluminum chop saws, identified as CS9 - CS12, with a maximum capacity of 50 cuts per hour of 1.5 x 1.5 inch aluminum (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(3) Four (4) wood chop saws, identified as CS13 - CS16, with a maximum capacity of 200 cuts per hour of 1.5 x 1.5 inch wood (2,400 lbs per hour, each), using no controls, and exhausting inside the building.

(4) Two (2) wood rip saws, identified as RS1 and RS2, with a maximum capacity of 50 cuts per hour of 1.5 x 0.75 inch wood (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(5) Two (2) wood table saws, identified as TS1 and TS2, with a maximum capacity of 20 cuts per hour of 1.5 x 1.75 inch wood (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(6) One (1) drill press, identified as DP1, with a maximum capacity of 80 wood pieces per hour (150 lbs per hour), using no controls, and exhausting inside the building.

(7) Four (4) hand router, identified as HR1 - HR4, with a maximum capacity of 120 linear feet of wood per hour (1,000 lbs per hour each), using no controls, and exhausting inside the building.

(g) Four (4) MIG welders, identified as W1 - W4, approved for construction in 2012, , with a maximum capacity of 2.5 pounds of electrodes per hour, each, using no controls, and exhausting inside the building.

(h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters:

(1) Nine (9) natural gas-fired thermo cyclers, identified as H1 - H9, approved for construction in 2012, rated at 0.30 MMBtu/hr, each, all exhausting through stacks SVH23 through SVH27;

(2) One (1) natural gas-fired air make-up heater, identified as H10, approved for construction in 2012, rated at 0.80 MMBtu/hr, exhausting through stack SVH28.

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, M087 31162-00080, 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.5 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.6 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.7 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.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M087 31162-00080 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 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.19 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.20 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 construct and 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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 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.17 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.18 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) surface coating booth, identified as PR1, approved for construction in 2012, using HVLP spray gun to coat a substrate of fiberglass, with a maximum capacity of 2.0 units per hour, using dry filters for particulate control, and exhausting to stack PBS1.

(b) One (1) assembly operation, identified as AO1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, wood, fabric and plastic, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(c) One (1) final finish operation, identified as FF1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, plastic and glass, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(d) One (1) touch-up paint area, identified as TUP1, approved for construction in 2012, using aerosol to coat a substrate of metal, with a maximum capacity of 0.5 units per hour, using no controls, and exhausting inside the building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 requirements not applicable, the VOC input, including coatings, dilution and cleaning solvents, to the surface coating booth, identified as PR1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11(b)(1)(A) (Fabric and Vinyl Coating), when coating fabric at the assembly operation, identified as AO1, the VOC content of coating delivered to the applicator for vinyl coating shall be limited to 2.9 pounds per gallon of coating excluding water.

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

Pursuant to 326 IAC 8-2-12, when coating wood at the assembly operation, identified as AO1, 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 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.

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

(a) Particulate from surface coating booth, identified as PR1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this PR1 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)

Compliance with the VOC limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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 8-1-4] [326 IAC 8-1-2(a)(7)]

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

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

Where:

$$A = \frac{\sum(C \times U)}{\sum U} \leq 2.9 \text{ lb VOC/gal}$$

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

D.1.8 Particulate

In order to comply with Condition D.1.4, the dry filters for particulate control shall be in operation at all times when the spray booth PR1 is in operation.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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

(2) The amount of assembly material and solvent used on a monthly basis.

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

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

(b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

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

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

D.1.10 Reporting Requirements

A quarterly report to document the compliance status with D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(g) One (1) woodworking area, identified as WW1, approved for construction in 2012, , with a maximum capacity of 5.13 tons of wood per hour, using integral baghouse for particulate control, and exhausting to stack DC1.

(h) One (1) miscellaneous operation, approved for construction in 2012, using no controls, and exhausting inside the building, consisting of:

(1) Eight (8) PVC chop saws, identified as CS1 - CS8, with a maximum capacity of 50 cuts per hour of 3 inch diameter PVC pipe (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(2) Four (4) aluminum chop saws, identified as CS9 - CS12, with a maximum capacity of 50 cuts per hour of 1.5 x 1.5 inch aluminum (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(3) Four (4) wood chop saws, identified as CS13 - CS16, with a maximum capacity of 200 cuts per hour of 1.5 x 1.5 inch wood (2,400 lbs per hour, each), using no controls, and exhausting inside the building.

(4) Two (2) wood rip saws, identified as RS1 and RS2, with a maximum capacity of 50 cuts per hour of 1.5 x 0.75 inch wood (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(5) Two (2) wood table saws, identified as TS1 and TS2, with a maximum capacity of 20 cuts per hour of 1.5 x 1.75 inch wood (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(6) One (1) drill press, identified as DP1, with a maximum capacity of 80 wood pieces per hour (150 lbs per hour), using no controls, and exhausting inside the building.

(7) Four (4) hand router, identified as HR1 - HR4, with a maximum capacity of 120 linear feet of wood per hour (1,000 lbs per hour each), using no controls, and exhausting inside the building.

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

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

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

Pursuant to 326 IAC 6-3-2, the particulate from the woodworking area (WW1) shall not exceed 12.27 pounds per hour when operating at a process weight rate of 5.13 tons per hour.

These pound per hour limitations are based upon the following:

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

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit ID	Process Weight Rate[1] (lb/hr)	Allowable Emissions[2] (lb/hr)
PVC Chop Saws (CS1 - CS8)	1,000	2.58
Aluminum Chop Saws (CS9-CS12)	1,600	3.53
Wood Chop Saws (CS13-CS16)	2,400	4.63
Rip Saws (RS1-RS2)	1,000	2.58
Table Saws (TS1-TS2)	1,600	3.53
Drill Press (DP1)	150	0.72
Hand Routers (HR1 - HR4)	1,000	2.58

1. The process weight is for each individual piece of equipment (for example the combined process weight for the PVC chop saws is 8,000 lbs/hour).
2. The allowable emissions are for each individual piece of equipment.

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

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

D.2.3 PSD Minor Limits [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) Particulate matter (PM) from the woodworking area, identified as WW1, shall not exceed 3.04 pounds per hour.

(b) PM10 from the woodworking area, identified as WW1, shall not exceed 3.04 pounds per hour.

(c) PM2.5 from the woodworking area, identified as WW1, shall not exceed 3.04 pounds per hour.

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.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the woodworking area (WW1) 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.2.5 Particulate Control

(a) In order to comply with Conditions D.2.1 and D.2.3, the baghouse shall be in operation and control emissions from the woodworking area (WW1) at all times that the woodworking area (WW1) is in operation.

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

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

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust (Stack DC1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking area (WW1). All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

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

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

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

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking process stack exhaust (Stack DC1). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(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

Quarterly Report

Source Name: Cruiser RV, LLC
Source Address: 290 West Dutch Drive, LaGrange, Indiana 46761
MSOP Permit No.: M087 31162-00080
Source: Surface Coating Booth PR1
Pollutant: VOC
Limit: The use of coatings and VOC solvents shall be limited such that the potential to emit (PTE) of VOC shall be limited to less than 25.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Year: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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:	Cruiser RV, LLC
Address:	290 West Dutch Drive
City:	LaGrange, Indiana 46761
Phone #:	(260) 562-3500
MSOP #:	M087 31162-00080

I hereby certify that Cruiser RV, LLC is:
☐ still in operation.
☐ no longer in operation.

I hereby certify that Cruiser RV, LLC is:
☐ in compliance with the requirements of MSOP M087 31162-00080.
☐ not in compliance with the requirements of MSOP M087 31162-00080.

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:

_____

_____

Mail to: Permit Administration and Support Section

Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Cruiser RV, LLC
290 West Dutch Drive
LaGrange, Indiana 46761

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Cruiser RV, LLC 290 West Dutch Drive, LaGrange, Indiana 46761, completed construction of the recreational vehicle (RV) manufacturer on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 17, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M087-31162-00080, Plant ID No. 087-00080 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

The Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and New Source Review and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**Cruiser RV, LLC**
Source Location:	**290 West Dutch Drive, LaGrange, IN 46761**
County:	**LaGrange**
SIC Code:	**3792 (Travel Trailers and Campers)**
Operation Permit No.:	**087-31162-00080**
Permit Reviewer:	**Bruce Farrar**

On November 17, 2012, the Office of Air Quality (OAQ) received an application from Cruiser RV, LLC related to the construction and operation of a new recreational vehicle (RV) manufacturer.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, 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]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. LaGrange 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) $PM_{2.5}$
LaGrange 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. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
LaGrange County has been classified as attainment or unclassifiable in Indiana for all other 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 New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cruiser RV, LLC on November 17, 2011, relating to construction and operation of a new recreational vehicle manufacturer.

The following is a list of the new emission units and pollution control devices:

(a) One (1) surface coating booth, identified as PR1, approved for construction in 2012, using HVLP spray gun to coat a substrate of fiberglass, with a maximum capacity of 2.0 units per hour, using dry filters for particulate control, and exhausting to stack PBS1.

(b) One (1) assembly operation, identified as AO1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, wood, fabric and plastic, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(c) One (1) final finish operation, identified as FF1, approved for construction in 2012, using manual application or aerosol to coat a substrate of metal, plastic and glass, with a maximum capacity of 0.5 units per hour, uses less than five (5) gallons of coating per day, using no controls, and exhausting inside the building.

(d) One (1) touch-up paint area, identified as TUP1, approved for construction in 2012, using aerosol to coat a substrate of metal, with a maximum capacity of 0.5 units per hour, using no controls, and exhausting inside the building.

(e) One (1) woodworking area, identified as WW1, approved for construction in 2012, , with a maximum capacity of 5.13 tons of wood per hour, using an integral baghouse for particulate control, and exhausting to stack DC1.

(f) One (1) miscellaneous operation, approved for construction in 2012, using no controls, and exhausting inside the building, consisting of:

(1) Eight (8) PVC chop saws, identified as CS1 - CS8, with a maximum capacity of 50 cuts per hour of 3 inch diameter PVC pipe (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(2) Four (4) aluminum chop saws, identified as CS9 - CS12, with a maximum capacity of 50 cuts per hour of 1.5 x 1.5 inch aluminum (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(3) Four (4) wood chop saws, identified as CS13 - CS16, with a maximum capacity of 200 cuts per hour of 1.5 x 1.5 inch wood (2,400 lbs per hour, each), using no controls, and exhausting inside the building.

(4) Two (2) wood rip saws, identified as RS1 and RS2, with a maximum capacity of 50 cuts per hour of 1.5 x 0.75 inch wood (1,000 lbs per hour, each), using no controls, and exhausting inside the building.

(5) Two (2) wood table saws, identified as TS1 and TS2, with a maximum capacity of 20 cuts per hour of 1.5 x 1.75 inch wood (1,600 lbs per hour, each), using no controls, and exhausting inside the building.

(6) One (1) drill press, identified as DP1, with a maximum capacity of 80 wood pieces per hour (150 lbs per hour), using no controls, and exhausting inside the building.

(7) Four (4) hand router, identified as HR1 - HR4, with a maximum capacity of 120 linear feet of wood per hour (1,000 lbs per hour each), using no controls, and exhausting inside the building.

(g) Four (4) MIG welders, identified as W1 - W4, approved for construction in 2012, , with a maximum capacity of 2.5 pounds of electrodes per hour, each, using no controls, and exhausting inside the building.

(h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters:

(1) Nine (9) natural gas-fired thermo cyclers, identified as H1 - H9, approved for construction in 2012, rated at 0.30 MMBtu/hr, each, all exhausting through stacks SVH23 through SVH27;

(2) One (1) natural gas-fired air make-up heater, identified as H10, approved for construction in 2012, rated at 0.80 MMBtu/hr, exhausting through stack SVH28.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

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

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	44.92
PM10(1)	44.98
PM2.5	44.98
SO_2	0.01
NO_x	1.04
VOC	39.87
CO	0.87
GHGs as CO_2e	1,256

(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)
Xylene	4.83
Toluene	2.5
MIBK	1.14
Hexane	1.09
Ethyl Benzene	1.04
Manganese	0.03
TOTAL HAPs	**10.59**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, PM2.5 and VOC pollutants are 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) 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.

(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.

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

(b) The requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), are not included in this permit, because the source is not a major source of HAPs.

(b) 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.

(c) 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.

(d) 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).

(e) 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).

(f) 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.

(g) 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)

(h) 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 new 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, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) 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.

The PTE of PM, PM10 and PM2.5 before controls is 265.99 tons per year. Permit level is determined after control for integral process, however, in this case, the before control PTE is greater than 250 tons per year of particulate.

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(1) Particulate matter (PM) from the woodworking area, identified as WW1, shall not exceed

3.04 pounds per hour.

(2) PM10 from the woodworking area, identified as WW1, shall not exceed 3.04 pounds per hour.

(3) PM2.5 from the woodworking area, identified as WW1, shall not exceed 3.04 pounds per hour.

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.

Pursuant to 326 IAC 2-2, the baghouse (DC1) shall be in operation at all times that the woodworking area, identified as WW1, is in operation and shall operate within manufacturer's specifications.

(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.

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions less than 25 tons per year.

<u>Surface Coating Booth (PR1)</u>

(h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The surface coating booth, identified as PR1, applies a coating using a HVLP spray gun to coat a

substrate of fiberglass and has the potential to use greater than five (5) gallons per day of coatings. Therefore, the requirements of 326 IAC 6-3-2 are applicable to PR1. Pursuant to 326 IAC 6-3-2(d), particulate from PR1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

(i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the surface coating booth (PR1), which coats fiberglass, is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the surface coating booth (RP1) to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the surface coating booth (PR1) shall be limited as follows:

The VOC input, including coatings, dilution solvents, and cleaning solvents, in the surface coating booth (PR1) shall be limited to less than 25.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from the surface coating booth (PR1) to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

(j) 326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-2-1(a)(4), the surface coating booth (PR1) was constructed after July 1, 1990 and has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. However, it does not perform surface coating of the types described in sections 2 through 8, 9(a)(1), and 10 through 12. Therefore 326 IAC 8-2 does not apply.

<u>Assembly Operation (AO1)</u>

(k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a)(15), the Assembly Operation (AO1) is exempt from the requirements of 326 IAC 6-3-2, because when it is coating metal it uses less than five (5) gallons of coating per day.

(l) 326 IAC 8 (VOC Rules)

(1) When coating fabric:
Pursuant to 326 IAC 8-2-1(a)(4), the assembly operation, identified as AO1, was constructed after July 1, 1990,has actual emissions of greater than fifteen (15) pounds of

VOC per day before add-on controls and performs surface coating on a fabric surface. Therefore the requirements of 326 IAC 8-2-11 are applicable.

Pursuant to 326 IAC 8-2-11(b)(1)(A), the VOC content of coating delivered to the applicator for vinyl coating shall be limited to 0.35 kilograms of VOC per liter (2.9 pounds per gallon) of coating excluding water. Based on the MSDS and calculations, the VOC content of the coatings used are greater than 2.9 pounds per gallon of coating.

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.

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

Where:

$$A = \frac{\sum(C \times U)}{\sum U} \leq 2.9 \text{ lb VOC/gal}$$

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

(see Appendix for the calculations)

(2) When coating metal
Pursuant to 326 IAC 8-2-1(a)(4), the assembly operation, identified as AO1, was constructed after July 1, 1990, has actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls and performs surface coating on metal. Therefore the requirements of 326 IAC 8-2-9 are not applicable.

(3) When coating wood
Pursuant to 326 IAC 8-2-1(a)(4), the assembly operation, identified as AO1, was constructed after July 1, 1990, has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls and performs surface coating of wood furniture or cabinets. Therefore the requirements of 326 IAC 8-2-12 are applicable.

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.

(4) When coating plastic:
Pursuant to 326 IAC 8-1-6, the assembly operation, identified as AO1, was constructed after January 1, 1980 and has potential emissions of less than 25 tons of VOC per year when coating plastic. Therefore, 326 IAC 8-1-6 does not apply

Final Finish Operation (FF1)

(m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a)(15), the final finish operation (FF1) is exempt from the requirements of 326 IAC 6-3-2, because it uses less than five (5) gallons of coating per day.

(n) 326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-1-1, the final finish operation (FF1), which coats metal, plastic and glass, is exempt from the requirements of 326 IAC 8-2 because VOC emissions are less than 15 lbs per day before controls.

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

Touch-Up Paint Area (TUP1)

(p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a)(15)8), the touch-up paint area (TUP1), which coats metal, is exempt from the requirements of 326 IAC 6-3-2, because it uses less than five (5) gallons of coating per day.

(q) 326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-1-1, the touch-up paint area (TUP1) is exempt from the requirements of 326 IAC 8-2 because VOC emissions are less than 15 lbs per day before controls.

Woodworking Area (WW1)

(r) 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 area, identified as WW1, shall not exceed 12.27 pounds per hour when operating at a process weight rate of 5.13 tons per hour. 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 baghouse shall be in operation at all times the woodworking area, identified as WW1, is in operation, in order to comply with this limit.

Miscellaneous Operation

(s) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit ID	Process Weight Rate[1] (lb/hr)	Allowable Emissions[2] (lb/hr)
PVC Chop Saws (CS 1 - CS8)	1,000	2.58
Aluminum Chop Saws (CS9-CS12)	1,600	3.53
Wood Chop Saws (CS13-CS16)	2,400	4.63
Rip Saws (RS1-RS2)	1,000	2.58
Table Saws (TS1-TS2)	1,600	3.53
Drill Press (DP1)	150	0.72
Hand Routers (HR1 - HR4)	1,000	2.58

1. The process weight is for each individual piece of equipment (for example the combined process weight for the PVC chop saws is 8,000 lbs/hour).
2. The allowable emissions are for each individual piece of equipment.

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

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

Welders

(u) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they consume less than 625 pounds of rod or wire per day.

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

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/(WW1) (baghouse)	baghouse inspection	Quarterly
Woodworking/(WW1) (baghouse)	Visible notation	Once per day

The surface coating booth (PR1) shall comply with 326 IAC 8-1-6 limits through record keeping and reporting requirements.

(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 November 17, 2011. Additional information was submitted by the applicant on February 15, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and MSOP No. 087-31162-00080. The staff recommends to the Commissioner that this New Source Construction and New Source Review and 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 Emissions

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

	Uncontrolled Emissions Tons per Year										
Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHG as CO2e**	**Total HAPs**	**Single HAP**	
Paint Booth (PR1)	2.53	2.53	2.53	-	-	33.08	-	-	9.41	4.79	Xylene
Assembly Operation (AO1)	6.07	6.07	6.07	-	-	6.55	-	-	1.07	1.07	Hexane
Final Finish (FF1)	-	-	-	-	-	0.14	-	-	0.05	0.05	Toluene
Touch-up (TUP1)	-	-	-	-		0.05	-	-	0.01	0.01	MIBK
Woodworking *	13.30	13.30	13.30	-		-	-	-	-	-	
Miscellaneous	22.76	22.76	22.76	-	-	-	-	-	-	-	
Welding	0.24	0.24	0.24	-	-	-	-	-	0.03	0.03	Manganese
Combustion	0.02	0.08	0.08	0.01	1.04	0.06	0.87	1,256	0.02	0.02	Hexane
Total:	**44.92**	**44.98**	**44.98**	**0.01**	**1.04**	**39.87**	**0.87**	**1,256**	**<25**	**<10**	

* PTE is after control (integral to process) for permit level determination.

Appendix A: Emissions Calculations
VOC and Particulate
From Paint Booth, PR1

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 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)	lb VOC/gal solids	Transfer Efficiency
Base Coat - Step 1																
BASF UR30	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	0.500	6.93	6.93	1.73	41.58	7.59	0.00		75%
Base Coat	10.4	99.00%	0.0%	99.0%	0.0%	50.00%	0.50000	0.500	10.34	10.34	2.58	62.01	11.32	0.03	20.67	75%
									Total Step 1:		**4.32**	103.59	**18.91**	**0.03**		
Clearcoat - Step 2																
Clearcoat LC4500	7.9	59.90%	0.0%	59.9%	0.0%	40.00%	0.50000	0.500	4.76	4.76	1.19	28.54	5.21	0.87	11.89	75%
LHF fast hardener	8.9	32.95%	0.0%	33.0%	0.0%	67.00%	0.50000	0.500	2.92	2.92	0.73	17.54	3.20	1.63	4.36	75%
									Total Step 2:		**1.92**	46.07	**8.41**	**2.50**		
Cleaning Solvent																
IPA (Isopropyl alcohol)	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.20000	0.500	6.50	6.50	0.65	15.60	2.85	0.00		100%
Acetone	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.20000	0.500	6.67	6.67	0.67	16.01	2.92	0.00		100%
									Total Cleaning:		**1.32**	31.61	**5.77**	**0.00**		

State Potential Emissions **Add worst case coating to all solvents** **7.55** **181.27** **33.08** **2.53**

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: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Permit Reviewer: Bruce Farrar
Date: November 17, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Base Coat - Step 1											
BASF UR30	6.9	0.500000	0.50	0.00%	15.00%	0.00%	0.00%	0.00	1.14	0.00	0.00
Base Coat	10.4	0.500000	0.50	21.20%	0.00%	9.90%	4.50%	2.42	0.00	1.13	0.51
Clearcoat - Step 2											
Clearcoat LC4500	7.9	0.500000	0.50	27.20%	0.00%	0.00%	6.00%	2.36	0.00	0.00	0.52
LHF fast hardener	8.9	0.500000	0.50	0.00%	13.50%	0.00%	0.00%	0.00	1.31	0.00	0.00
Cleaning Solvent											
IPA (Isopropyl alcohol)	6.5	0.500000	0.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Acetone	6.7	0.500000	0.50	0.00%	0.00%	0.00%	0.05%	0.00	0.00	0.00	0.00
Total State Potential Emissions								**4.79**	**2.45**	**1.13**	**1.04**
										Total HAPs:	**9.41**

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and Particulate
From Assembly Operation (AO1)

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 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)	lb VOC/gal solids	Transfer Efficiency	Substrate
Sikaflex 552 Adhesive	12.1	1.34%	0.0%	1.3%	0.0%	97.80%	0.00850	0.500	0.16	0.16	6.89E-04	0.017	3.02E-03	0.11	0.17	50%	metal
Sikaflex 551 Adhesive	10.6	0.00%	0.0%	0.0%	0.0%	100.00%	0.00120	0.500	0.00	0.00	0.00E+00	0.000	0.00E+00	0.00	0.00	100%	metal
									total for metal substrate:		**6.89E-04**	**0.02**	**3.02E-03**	**0.11**			
Bondaflex SIL-100-GP Sealant	7.9	9.00%	0.0%	9.0%	0.0%	90.32%	0.19900	0.500	0.71	0.71	0.07	1.70	0.31	0.00	0.79	100%	wood/fabric
Manus 25-AM Adhesive	11.9	11.00%	0.0%	11.0%	0.0%	99.83%	0.12550	0.500	1.31	1.31	0.08	1.97	0.36	1.45	1.31	50%	wood/fabric
Manus 501-A Sealent	10.7	1.69%	0.0%	1.7%	0.0%	97.55%	0.21850	0.500	0.18	0.18	0.02	0.47	0.09	2.51	0.19	50%	wood/fabric
Manus 75-AM Adhesive	14.2	0.00%	0.0%	0.0%	0.0%	100.00%	0.12850	0.500	0.00	0.00	0.00	0.00	0.00	2.00	0.00	50%	wood/fabric
StaPut SP-90 adhesive	6.1	70.30%	25.0%	45.3%	18.2%	41.93%	0.61650	0.500	3.37	2.75	0.85	20.38	3.72	0.00	6.57	100%	wood/fabric
StaPut SP-80 adhesive	6.2	80.90%	27.3%	53.6%	53.6%	20.23%	0.21850	0.500	7.14	3.31	0.36	8.69	1.59	0.00	16.37	100%	wood/fabric
									total for wood/fabric substrate:		**1.38**	**33.20**	**6.06**	**5.96**			
Oalay 60E5 Pipe joint compound	16.9	0.00%	0.0%	0.0%	0.0%	100.00%	0.00260	0.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	plastic
IPS 771,773 (cement)	7.3	100.00%	15.0%	85.0%	0.0%	1.36%	0.03570	0.500	6.17	6.17	0.11	2.64	0.48	0.00	453.75	100%	plastic
									total for plastic substrate:		**0.11**	**2.64**	**0.48**	**0.00**			

State Potential Emissions **Add worst case coating to all solvents** **1.49** **35.86** **6.55** **6.07**

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
Assembly Operation HAP Emission Calculations

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Permit Reviewer: Bruce Farrar
Date: November 17, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Hexane Emissions (ton/yr)
Sikaflex 552 Adhesive	12.1	0.00850	0.500	0.00%	0.00
Sikaflex 551 Adhesive	10.6	0.00120	0.500	0.00%	0.00
Bondaflex SIL-100-GP Sealant	7.9	0.19900	0.500	0.00%	0.00
Manus 25-AM Adhesive	11.9	0.12550	0.500	0.00%	0.00
Manus 501-A Sealent	10.7	0.21850	0.500	0.00%	0.00
Manus 75-AM Adhesive	14.2	0.12850	0.500	0.00%	0.00
StaPut SP-90 adhesive	6.1	0.61650	0.500	13.00%	1.07
StaPut SP-80 adhesive	6.2	0.21850	0.500	0.00%	0.00
Oalay 60E5 Pipe joint compound	16.9	0.00260	0.500	0.00%	0.00
IPS 771,773	7.3	0.03570	0.500	0.00%	0.00

Total State Potential Emissions **1.07**

METHODOLOGY

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

Appendix A: Emissions Calculations
Daily Volume-Weighted Average
Assembly Operation (AO1), when coating fabric

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Σ(C*U)	Σ U	A = [Σ (C x U) / Σ U]
Bondaflex SIL-100-GP Sealant	0.19900	0.500	0.71	1.70	2.39	
Manus 25-AM Adhesive	0.12550	0.500	1.31	1.97	1.51	
Manus 501-A Sealent	0.21850	0.500	0.18	0.47	2.62	
Manus 75-AM Adhesive	0.12850	0.500	0.00	0.00	1.54	
StaPut SP-90 adhesive	0.61650	0.500	3.37	24.92	7.40	
StaPut SP-80 adhesive	0.21850	0.500	7.14	18.72	2.62	
				47.78	**18.08**	**2.64**

METHODOLOGY:

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

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

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 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	Substrate
3M 5990 (Polish)	8.3	83.40%	74.2%	9.2%	0.0%	16.53%	0.00010	0.166	0.76	0.76	0.00	0.00	0.00	0.00	100%	metal/plastic
3M 5936 (Polish)	9.6	63.00%	31.0%	32.0%	0.0%	18.77%	0.00020	0.166	3.06	3.06	0.00	0.00	0.00	0.00	100%	metal/plastic
TCI DT-10 (cleaner)	7.0	100.00%	13.2%	86.8%	0.0%	0.00%	0.01350	0.166	6.09	6.09	0.01	0.33	0.06	0.00	100%	solvent/cleaner
TCI Acetone (cleaner)	6.6	100.00%	100.0%	0.0%	0.0%	0.00%	0.00230	0.166	0.00	0.00	0.00	0.00	0.00	0.00	100%	solvent/cleaner
TCI Isopropanol (cleaner)	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00920	0.166	6.59	6.59	0.01	0.24	0.04	0.00	100%	solvent/cleaner
Camie-Campbell CC-911 (cleaner)	9.4	9.47%	0.0%	9.5%	0.0%	0.00%	0.02490	0.166	0.89	0.89	0.00	0.09	0.02	0.00	100%	solvent/cleaner
Cyclo C-31 (glass cleaner)	9.3	98.00%	78.0%	20.0%	0.0%	0.00%	0.00000	0.166	1.86	1.86	0.00	0.00	0.00	0.00	50%	glass
Cyclo C-192 (cleaner)	8.3	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.166	0.00	0.00	0.00	0.00	0.00	0.00	100%	solvent/cleaner
TCI mineral spirits (cleaner)	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00150	0.166	6.59	6.59	0.00	0.04	0.01	0.00	50%	solvent/cleaner
Convenience Products (CP-200)	5.6	100.00%	85.0%	15.0%	0.0%	0.00%	0.01670	0.166	0.84	0.84	0.00	0.06	0.01	0.00	50%	metal
State Potential Emissions			**Add worst case coating to all solvents**				**0.06840**				**0.03**	**0.76**	**0.14**	**0.00**		

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: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Permit Reviewer: Bruce Farrar
Date: November 17, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Ethyl Benzene	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
3M 5990 (Polish)	8.3	0.00010	0.166	0.00%	0.00%	0.00	0.00
3M 5936 (Polish)	9.6	0.00020	0.166	0.00%	0.10%	0.00	1.39E-06
TCI DT-10 (cleaner)	7.0	0.01350	0.166	67.00%	0.00%	0.05	0.00
TCI Acetone (cleaner)	6.6	0.00230	0.166	0.00%	0.00%	0.00	0.00
TCI Isopropanol (cleaner)	6.6	0.00920	0.166	0.00%	0.00%	0.00	0.00
Camie-Campbell CC-911 (cleaner)	9.4	0.02490	0.166	0.00%	0.00%	0.00	0.00
Cyclo C-31 (glass cleaner)	9.3	0.00000	0.166	0.00%	0.00%	0.00	0.00
Cyclo C-192 (cleaner)	8.3	0.00000	0.166	0.00%	0.00%	0.00	0.00
TCI mineral spirits (cleaner)	6.6	0.00150	0.166	0.00%	0.00%	0.00	0.00
Convenience Products (CP-200)	5.6	0.01670	0.166	0.00%	0.00%	0.00	0.00
Total State Potential Emissions						**0.05**	**1.39E-06**

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC
From Surface Coating Operations

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

VOC

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Ruslolium Black (touch-up)	6.4	92.98%	7.0%	86.0%	0.0%	0.00%	0.00400	0.500	5.54	5.54	0.01	0.27	0.05	0.00		50%
State Potential Emissions			**Add worst case coating to all solvents**								**0.01**	**0.27**	**0.05**	**0.00**		

HAP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MIBK	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Total HAPs (ton/yr)
Ruslolium Black (touch-up)	6.4	0.00400	0.500	5.00%	1.00%	10.00%	**2.82E-03**	**5.64E-04**	**0.01**	**0.009**

METHODOLOGY

VOC

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

HAP

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

Appendix A: Emissions Calculations
VOC
From Surface Coating Operations

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

Emission Units	Inlet Grain Loading (gr/acf)	Air to Cloth Ration air flow (acfm/ft^2)	Total Filter Area (ft^2)	Control Device fan flow rate (acfm)	PM Control Efficiency* (%)	Potential PM/PM_{10} Emission Rate				Process Weight (lbs/hr)	326 IAC 6-3-2 PM Emission Rate (lbs/hr)
						Before Controls		After Controls			
						(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)		
Mill Room and Cabinet Shop (DC-1)	12.27	0.275	9,920	2,725	95.0%	60.73	265.99	3.04	13.30	10,265	12.27

Methodology:
* Actual control efficiency is listed as 99.95% in the permit application, but a lower efficiency is used herein to provide greater operating flexibility which does not affect compliance with the allowable emission limits for these operations.
Potential Uncontrolled Emissions (tons/yr) = Inlet Loading (grain/acf) * Air/Cloth Ratio (acfm/ft^2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 tons/2,000 lbs.
Potential Controlled Emissions (ton/yr) = Inlet Loading (grains/acf) * Air/Cloth Ration (acfm/ft2) * Filter Area (ft2) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1 - Control efficeincy)
Total PM is conservatively assumed equal to PM10

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

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

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
Particulate
From Miscellaneous PM

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

PVC Chop Saws (CS 1 - CS8)

No. cuts/ hr	pipe diameter (inches)	π	pipe thickness (inches)	blade thickness (inches)	loss/hr (in^3)	in^3/ft^3	lbs/ft^3	PM (lbs/hr)	PM (tons/yr)
50	3	3.1416	0.125	0.125	7.36	1,728	87.71	**0.37**	**1.64**

Emission Units	No. cuts/hr	Length (inches)	Thickness (inches)	width (inches)	loss/hr (in^3)	in^3/ft^3	lbs/ft^3	PM (lbs/hr)	PM (tons/yr)
Aluminum Chop Saws (CS9-	50	1.5	1.5	0.125	14.06	1,728	40	0.33	1.43
Wood Chop Saws (CS13-	50	1.5	1.5	0.125	14.06	1,728	40	0.33	1.43
Rip Saws (RS1-RS2)	20	1.5	0.75	2.5	56.25	1,728	40	1.30	5.70
Table Saws (TS1-TS2)	20	4	0.125	0.125	1.25	1,728	168.43	0.12	0.53
							Total:	**2.07**	**9.09**

Drill Press (DP1)

BF/hr	BF/Piece	Pieces/hr	Drill/Piece	π	r^2*	Drill Depth (inches)	loss/hr (in^3)	in^3/ft^3	lbs/ft^3	PM (lbs/hr)	PM (tons/yr)
20	4.0	80	6.00	3.1416	0.06	1.25	117.81	1,728	40.00	**2.73**	**11.94**

* 1/4 inch diamenter drill bit

Hand Routers (HR1 - HR4)

BF/hr	bit width (inches)	edge trimming (depth inches)	loss/hr (in^3)	in^3/ft^3	lbs/ft^3	PM (lbs/hr)	PM (tons/yr)
120	0.125	0.06	0.90	1,728	40	**0.02**	**0.09**

total:	**PM (lb/hr)**	**PM (tons/yr)**
	5.20	**22.76**

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG)(carbon steel)	4	2.5		0.0055	0.00318	1E-05	1E-05	1E-05	0.055	0.032	1.E-04	1.E-04	1.E-04	0.032
EMISSION TOTALS														
Potential Emissions lbs/hr									0.06					0.03
Potential Emissions lbs/day									1.32					0.77
Potential Emissions tons/year									0.24					0.14

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm th
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thi
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,0(
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

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

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
2.4	1000	20.8

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.04	0.06	0.87

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 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 13 for HAPs emissions calculations.

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

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 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	2.185E-05	1.248E-05	7.802E-04	0.02	3.537E-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	5.201E-06	1.144E-05	1.456E-05	3.953E-06	2.185E-05

Methodology is the same as page 12.

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 3 for Greenhouse Gas calculations.

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

Company Name: Cruiser RV, LLC
Address City IN Zip: 290 W. Dutch Dr, LaGrange, IN 46760
Permit Number: M087-31162-00080
Plt ID: 087-00080
Reviewer: Bruce Farrar
Date: November 17, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,248	0.0	0.0
Summed Potential Emissions in tons/yr	1,248		
CO2e Total in tons/yr	1,256		

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).

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: Jon Stallman
Cruiser RV LLC
PO Box 130
Howe, IN 46746

DATE: May 1, 2012

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

SUBJECT: Final Decision
MSOP
087 - 31162 - 00080

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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(317) 232-8603
Toll Free (800) 451-6027
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May 1, 2012

TO: LaGrange County Public Library (Topeka Branch)

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

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

Applicant Name: Cruiser RV, LLC
Permit Number: 087 - 31162 - 00080

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	CDENNY 05/01/2012 Cruiser RV LLC 31162 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Jon Stallman Cruiser RV LLC PO Box 130 Howe IN 46746 (Source CAATS)									
2		Jeff Fought President Cruiser RV LLC PO Box 130 Howe IN 46746 *(RO CAATS)*									
3		LaGrange County Public Library (Topeka Branch) 105 South Main Street Topeka IN 46571 *(Affected Party)*									
4		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
5		LaGrange Co Public Library 203 W Spring St Lagrange IN 46761-1899 *(Library)*									
6		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 *(Health Department)*									
7		LaGrange Town Council 1201 N Townline Road LaGrange IN 46761 *(Local Official)*									
8		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 *(Local Official)*									
9		Nate Black D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
10											
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