



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 2, 2012

RE: EverGreen Recreational Vehicles, LLC/039-31359-00719

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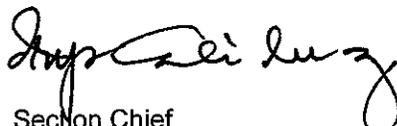
## New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**EverGreen Recreational Vehicles, LLC**  
**51700 Lovejoy Drive**  
**Middlebury, Indiana 46540**

(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.: M039-31359-00719	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 3, 2012  Expiration Date: April 3, 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)]

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The Permittee owns and operates a stationary recreational travel trailer assembly operation.

Source Address:	51700 Lovejoy Drive, Middlebury, Indiana 46540
General Source Phone Number:	(574) 825-4298
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) fabrication line, identified as Fab Line 2, approved for construction in 2012, with a nominal capacity of 1.0 recreational vehicle per hour, using less than five (5) gallons of non-exempt coatings per day, utilizing no control devices, exhausting within the building, and consisting of hand application of coatings and use of aerosol cans.
- (b) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a nominal lumber capacity of 825 lbs/hr, utilizing dust collector WWDC2 as particulate control, exhausting within the building, and consisting of:
  - (1) Twenty (20) chop saws, identified as CS11 through CS30;
  - (2) One (1) pin router, identified as PR2;
  - (3) Three (3) table saws, identified as TS3, TS4, and TS5;
  - (4) One (1) door machine, identified as DM2;
  - (5) Two (2) band saws, identified as BS3 and BS4;
  - (6) Two (2) edge sanders, identified as ES3 and ES4; and
  - (7) Two (2) radial arm saws, identified as RAS3 and RAS4.
- (c) One (1) welding operation, approved for construction in 2012, using less than six hundred twenty-five (625) pounds of weld wire per day, exhausting within the building, and consisting of:
  - (1) Eight (8) tungsten inert gas (TIG) welding stations, identified as TIG1-TIG8, nominally rated for a maximum capacity of 0.60 pounds electrode per hour each.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
  - (1) One (1) forced air space heater identified as H55, rated at 0.60 million British thermal units per hour.

- (2) Thirty (30) radiant tube heaters identified as H25-H54, each rated at 0.201 million British thermal units per hour.
- (e) Paved roads and parking lots with public access.

## **SECTION B GENERAL CONDITIONS**

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

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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)]**

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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]**

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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)]**

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- (a) This permit, M039-31359-00719, 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]**

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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**

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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**

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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**

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

**B.9 Duty to Provide Information**

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- (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)]**

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- (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]**

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- (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 M039-31359-00719 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]**

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- (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]**

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- (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]**

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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]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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.8 Performance Testing [326 IAC 3-6]**

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

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

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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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- (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.12 Response to Excursions or Exceedances**

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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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.14 Malfunctions Report [326 IAC 1-6-2]**

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

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

#### **C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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

Indiana Department of Environmental Management  
Compliance 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) fabrication line, identified as Fab Line 2, approved for construction in 2012, with a nominal capacity of 1.0 recreational vehicle per hour, using less than five (5) gallons of non-exempt coatings per day, utilizing no control devices, exhausting within the building, and consisting of hand application of coatings and use of aerosol cans.

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

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

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

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

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

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the Fab Line 2. 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.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)(7)]

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

conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

Where:

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

A = Daily volume weighted average in pounds VOC per gallon, as applied

C = As-applied VOC content of coating in pounds VOC per gallon

U = Usage rate of coating in gallons per day

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

#### **D.1.5 Record Keeping Requirements**

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

- (1) The VOC content of each coating material and solvent used less water;
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content;
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
- (2) The volume weighted VOC content less water of the non-compliant coatings used for each day.

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

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a nominal lumber capacity of 825 lbs/hr, utilizing dust collector WWDC2 as particulate control, exhausting within the building, and consisting of:
- (1) Twenty (20) chop saws, identified as CS11 through CS30;
  - (2) One (1) pin router, identified as PR2;
  - (3) Three (3) table saws, identified as TS3, TS4, and TS5;
  - (4) One (1) door machine, identified as DM2;
  - (5) Two (2) band saws, identified as BS3 and BS4;
  - (6) Two (2) edge sanders, identified as ES3 and ES4; and
  - (7) Two (2) radial arm saws, identified as RAS3 and RAS4.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking operation, identified as WW2, shall not exceed 2.27 pounds per hour when operating at a process weight rate of 825 pounds per hour.

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

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

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

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

A Preventive Maintenance Plan is required for the one (1) woodworking operation, identified as WW2, and the dust collector WWDC2. 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.2.3 Particulate Matter (PM)

The dust collector system, identified as WWDC2, shall be in operation and control emissions from the woodworking operations at all times the emission units are in operation.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(a)(2)] [326 IAC 2-6.1-5(1)(2)]

#### D.2.4 Visible Emissions Notations

- (a) Visible emissions notations of the woodworking operation dust collector WWDC2 stack exhausts shall be performed once per day 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, eight percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps.

Section C – Response to Excursions and 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.2.5 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.2.6 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the woodworking operations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	EverGreen Recreational Vehicles, LLC
<b>Address:</b>	51700 Lovejoy Drive
<b>City:</b>	Middlebury, Indiana 46540
<b>Phone #:</b>	(574) 825-4298
<b>MSOP #:</b>	M039-31359-00719

I hereby certify that EverGreen Recreational Vehicles, LLC  still in operation.  
is:

no longer in operation.

I hereby certify that EverGreen Recreational Vehicles, LLC  in compliance with the requirements of  
is: MSOP M039-31359-00719.

not in compliance with the requirements of  
MSOP M039-31359-00719.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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:

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Mail to: Permit Administration and Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

EverGreen Recreational Vehicles, LLC  
51700 Lovejoy Drive  
Middlebury, Indiana 46540

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 EverGreen Recreational Vehicles, LLC 51700 Lovejoy Drive, Middlebury, Indiana 46540, completed construction of the recreational travel trailer assembly operation on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 13, 2012, and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M039-31359-00719, Plant ID No. 039-00719 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)

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the Technical Support Document (ATSD) for a  
New Source Construction and Minor Source Operating Permit (MSOP)

**Source Background and Description**

<b>Source Name:</b>	<b>EverGreen Recreational Vehicles, LLC</b>
<b>Source Location:</b>	<b>51700 Lovejoy Drive, Middlebury, IN 46540</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3792 (Travel Trailers and Campers)</b>
<b>Operation Permit No.:</b>	<b>M039-31359-00719</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

On February 26, 2012 the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that EverGreen Recreational Vehicles, LLC had applied for a New Source Construction and Minor Source Operating Permit (MSOP) related to the construction and operation of a new recreational travel trailer assembly operation. The notice also stated that the OAQ proposed to issue a MSOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

**Additional Changes**

IDEM, OAQ has decided to add a Source Definition in this Addendum for EverGreen Recreational Vehicles, LLC for historical purposes. This requires no changes to the permit. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD.

EverGreen Recreational Vehicles, LLC will be constructing its new recreational travel trailer assembly plant (source number 039-00719) less than two miles from its existing travel trailer assembly plant (source number 039-00688). IDEM, OAQ has examined whether the two plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two plants to be considered one major source, they must meet all three of the following criteria:

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

IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source". Air-005 states that if two plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of both plants, then common ownership exists. Since the two plants are each 100% owned by EverGreen Recreational Vehicles, LLC the first element of the major source definition is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business.

More information about SIC Codes is available at [http://www.osha.gov/pls/imis/sic\\_manual.html](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. Both plants have the two-digit SIC Code 37 for the Major Group Transportation Equipment.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. There is no significant support relationship planned between the new plant and the existing plant. However, depending on future circumstances, some material from one plant might go to the other plant, but it would be insignificant, far less than 50% of the output of either plant. Therefore, there is no support facility relationship. However, since the plants have the same two-digit SIC Code they meet the second part of the major source definition.

The last part of the definition examines whether the plants are on contiguous or adjacent properties. The plants are located on separate properties, about one and a half miles apart. Since the plants are not on a contiguous property, IDEM examined whether the plants are on adjacent properties.

The dictionary definition of "adjacent" as "close to; lying near" is very general. In determining if two or more plants are adjacent, IDEM follows its nonrule policy document NPD Air-005 and focuses on the distance between the plants and the interaction between them. This is done on an individual basis looking at the specific circumstances of the sources involved.

Two U.S. EPA advisory letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent". These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are "adjacent" going as far back as the preamble to the 1980 NSR program definition of "major source".

The evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. In addition to determining the distance between the sources, IDEM asks these questions:

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

As stated above, some materials may be transferred between the two plants, but such transfers would be insignificant. The new plant will have separate managers and separate staff from those at the existing plant with no managers or other workers frequently shuttling between the plants. The travel trailer assembly process will not be split between the plants, as each will operate as a separate assembly plant. The plants are not close enough to enable them to operate as one source. The new plant is therefore not adjacent to the existing plant and does not meet the third part of the major source definition.

Since the plants do not meet all three parts of the major source definition, IDEM, OAQ has determined that the new plant and the existing plant are not part of the same major source.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed MSOP can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.

- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Indiana Department of Environmental Management  
Office of Air Quality**

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

**Source Description and Location**

**Source Name:** EverGreen Recreational Vehicles, LLC  
**Source Location:** 51700 Lovejoy Drive, Middlebury, IN 46540  
**County:** Elkhart  
**SIC Code:** 3792 (Travel Trailers and Campers)  
**Operation Permit No.:** M039-31359-00719  
**Permit Reviewer:** Sarah Street

On January 13, 2012, the Office of Air Quality (OAQ) received an application from EverGreen Recreational Vehicles, LLC related to the construction and operation of a new recreational travel trailer assembly operation.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

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

Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10)

tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> 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**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### Fugitive Emissions

- (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 EverGreen Recreational Vehicles, LLC on January 13, 2012, relating to the construction and operation of a new recreational travel trailer assembly operation.

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

- (a) One (1) fabrication line, identified as Fab Line 2, approved for construction in 2012, with a nominal capacity of 1.0 recreational vehicle per hour, using less than five (5) gallons of non-exempt coatings per day, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of aerosol cans.
- (b) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a nominal lumber capacity of 825 lbs/hr, utilizing dust collector WWDC2 as particulate control, exhausting within the building, and consisting of:
- (1) Twenty (20) chop saws, identified as CS11 through CS30;
  - (2) One (1) pin router, identified as PR2;
  - (3) Three (3) table saws, identified as TS3, TS4, and TS5;
  - (4) One (1) door machine, identified as DM2;
  - (5) Two (2) band saws, identified as BS3 and BS4;
  - (6) Two (2) edge sanders, identified as ES3 and ES4; and
  - (7) Two (2) radial arm saws, identified as RAS3 and RAS4.
- (c) One (1) welding operation, approved for construction in 2012, using less than six hundred twenty-five (625) pounds of weld wire per day, utilizing no control, exhausting within the building, and consisting of:
- (1) Eight (8) tungsten inert gas (TIG) welding stations, identified as TIG1-TIG8, nominally rated for a maximum capacity of 0.60 pounds electrode per hour each.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
- (1) One (1) forced air space heater identified as H55, rated at 0.60 million British thermal units per hour.

- (2) Thirty (30) radiant tube heaters identified as H25-H54, each rated at 0.201 million British thermal units per hour.

- (e) Paved roads and parking lots with public access.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this source.

<b>Emission Calculations</b>
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See Appendix A of this TSD for detailed emission calculations.

<b>Permit Level Determination – MSOP</b>
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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	1.62
PM10 <sup>(1)</sup>	1.72
PM2.5	1.70
SO <sub>2</sub>	0.02
NO <sub>x</sub>	2.90
VOC	48.46
CO	2.44
GHGs as CO <sub>2</sub> e	3,506

(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)
Tetrachloroethylene	8.94
Hexane	5.72
Toulene	2.79
Xylene	2.53
Ethyl Benzene	1.20
Methanol	0.74
MDI	0.06
Vinyl Acetate	0.01
<b>TOTAL HAPs</b>	<b>22.00</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is 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<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

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

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not applicable, since this source is not an automobile or light duty truck assembly plant. This source assembles non-motorized travel trailers for attachment to passenger cars or other vehicles using pre-manufactured components.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 20-85), are not included in the permit, since this source is not located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, is not a major source, is not located at a major source, and is not part of a major source of emissions of hazardous air pollutants (HAP).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit because the source is not a major source of HAPs as defined in 40 CFR 63.2.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP are not included in the permit since this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (f) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH), because this source does not meet the definition of spray application of coatings to motor vehicles and mobile equipment. Pursuant to 40 CFR 63.11170(a)(2) this source does perform application of coatings to motor vehicles and mobile equipment. Pursuant to 40 CFR 63.11180, *mobile equipment* means any device that may be drawn and/or driven on a

roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels). However, pursuant to the definition of *spray application of coatings*, in 40 CFR 63.11180, spray-applied coatings do not include surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens. Since this source uses only hand application of coatings and hand-held aerosol containers, this source is not meet the applicability criteria as outline in 40 CFR 63.11169(b).

The source also does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (40 CFR 63.11169(a)), and does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment (40 CFR 63.11169(c)). Therefore, this source is not subject to NESHAP Subpart HHHHHH.

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in the permit, since the source is not primarily engaged in operations which are classified in one of the nine source categories listed in this NESHAP.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

#### Compliance Assurance Monitoring (CAM)

- (i) 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.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte

County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### Fabrication Line

- (g) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(15), the fabrication line, identified as Fab Line 2, is exempt from the requirements of 326 IAC 6-3, because less than five (5) gallons of non exempt coatings with potential particulate emissions are used per day.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited VOC potential emissions from the new facility Fab Line 2 is greater than twenty-five (25) tons per year. However, the source is subject to the emission limitation requirements outlined in 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), which shall limit the VOC emissions from Fab Line 2. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (i) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)  
Pursuant to 326 IAC 8-2-2, the fabrication line, identified as Fab Line 2, is exempt from the requirements of 326 IAC 8-2-2, because the source does not coat passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles.
- (j) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The fabrication line Fab Line 2 is subject to 326 IAC 8-2-9 because the actual VOC emissions are greater than 15 lb/day when coating metal and the facility was constructed after 1990.
  - (1) Pursuant to 326 IAC 8-2-9, when coating metal, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
    - (a) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) by preparing or obtaining from the manufacturer the copies of the as supplied and as applied VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

Where:

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

A = Daily volume weighted average in pounds VOC per gallon, as applied

C = As-applied VOC content of coating in pounds VOC per gallon

U = Usage rate of coating in gallons per day

Based on information provided by the source, the daily volume weighted VOC average of all the coatings used in the assembly operation is less than 3.5 pounds per gallon, excluding water (see TSD Appendix A for detailed calculations). Therefore, compliance with 326 IAC 8-2-9 is expected.

- (2) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### Woodworking Operation

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation WW2 shall not exceed 2.27 pounds per hour when operating at a process weight rate of 825 pounds 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:

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

The dust collector WWDC2 shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

### Welding Operations

- (l) 326 IAC 6-3 (Particulate Emission Limitations, Work Practices, and Control Technologies) Pursuant to 326 IAC 6-3-1(a)(9) the eight (8) tungsten inert gas (TIG) welding stations, identified as TIG1-TIG8, are exempt from the requirements of 326 IAC 6-3, because their potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

### **Compliance Determination, Monitoring and Testing Requirements**

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

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>
Woodworking dust collector system, WWDC2	Visible emissions	Daily
	Baghouse inspection	Quarterly

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

### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 13, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 039-31359-00719. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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](http://www.in.gov/idem)

**SUMMARY OF EMISSIONS**

**Company Name:** EverGreen Recreational Vehicles, LLC  
**Address City IN Zip:** 51700 Lovejoy Drive, Middlebury, IN 46540  
**Permit Number:** M039-31359-00719  
**Plt ID:** 039-00719  
**Reviewer:** Sarah Street  
**Date:** 1/18/2012

Process/ Emission Units	Unlimited Potential to Emit (tons/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Worst Single HAP	Total HAP
Fabrication Line	0.89	0.89	0.89	-	-	48.30	-	-	8.94 Tetrachloroethylene	21.94
Woodworking *	0.48	0.48	0.48	-	-	-	-	-	-	-
Welding	0.11	0.11	0.11	-	-	-	-	-	0.007 Manganese	0.007
Combustion	0.06	0.22	0.22	0.02	2.90	0.16	2.44	3,506	0.05 Hexane	0.055
Paved Roads	0.08	0.02	0.00	-	-	-	-	-	-	-
<b>Total PTE</b>	<b>1.62</b>	<b>1.72</b>	<b>1.70</b>	<b>0.02</b>	<b>2.90</b>	<b>48.46</b>	<b>2.44</b>	<b>3,506</b>	<b>8.94 Tetrachloroethylene</b>	<b>22.00</b>

**Note:**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From One (1) Fabrication Line**

**Company Name: EverGreen Recreational Vehicles, LLC  
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540  
Permit Number: M039-31359-00719  
Pit ID: 039-00719  
Reviewer: Sarah Street  
Date: 1/18/2012**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SIA 477W Adhesive	9.90	27.10%	0.0%	27.1%	0.0%	72.90%	0.50500	1.000	2.68	2.68	1.35	32.52	5.93	0.00	3.68	100%
SIA-115 Adhesive*	8.90	20.00%	0.0%	20.0%	0.0%	85.00%	3.59000	1.000	1.78	0.005	0.02	0.46	0.08	0.00	2.09	100%
2300 MH/RV	9.93	3.80%	0.0%	3.8%	0.0%	96.20%	0.49900	1.000	0.38	0.38	0.19	4.52	0.82	0.00	0.39	100%
Primamelt 37-155	8.00	1.00%	0.0%	1.0%	0.0%	99.00%	0.37500	1.000	0.08	0.08	0.03	0.72	0.13	0.00	0.08	100%
Econobond Adhesive	5.76	63.90%	10.0%	53.9%	10.0%	47.00%	1.49900	1.000	3.45	3.11	4.66	111.73	20.39	0.00	6.61	100%
Spray-N-Go Enamel	6.26	90.00%	22.5%	67.5%	25.0%	10.00%	0.12500	1.000	5.63	4.23	0.53	12.68	2.31	0.09	42.26	75%
502 Silicone Sealant	8.51	33.60%	0.0%	33.6%	0.0%	66.40%	0.25000	1.000	2.86	2.86	0.71	17.16	3.13	0.00	4.31	100%
Z Shield 7800	9.60	38.50%	3.5%	35.0%	0.0%	61.50%	0.12500	1.000	3.36	3.36	0.42	10.08	1.84	0.81	5.46	75%
Mineral Spirits 150	6.62	100.00%	0.0%	100.0%	0.0%	0.00%	0.25000	1.000	6.62	6.62	1.66	39.72	7.25	0.00	N/A	100%
Lacquer Thinner	6.74	100.00%	13.2%	86.8%	13.0%	0.00%	0.25000	1.000	6.72	5.85	1.46	35.10	6.41	0.00	N/A	100%

**Potential Emissions:      11.03                      264.68                      48.30                      0.89**

**Note:**

Coating applied using hand held manual application systems

\*Based on manufacturer's specifications, the SIA-115 Adhesive has an approximate cure time of 17 minutes at 60F and a negligible evaporation rate. Therefore, potential VOC (MDI) emissions are assumed to be minimal.

**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

**326 IAC 8-2-9 Compliance Calculation**

Limit: 3.5 lb VOC/gal coating less water

**Volume Weighted Daily Average of Coatings (lb VOC/gal)=**

**0.32** Will be able to comply

**Appendix A: Emission Calculations  
HAP Emission Calculations  
From One (1) Fabrication Line**

**Company Name: EverGreen Recreational Vehicles, LLC  
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540  
Permit Number: M039-31359-00719  
Pit ID: 039-00719  
Reviewer: Sarah Street  
Date: 1/18/2012**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Tetrachloroethylene	Weight % MDI	Weight % Hexane	Weight % Vinyl Acetate	Weight % Methanol	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Tetrachloroethylene Emissions (ton/yr)	MDI* Emissions (ton/yr)	Hexane Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)		
SIA 477W Adhesive	9.90	0.50500	1.000	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	2.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09	
SIA-115 Adhesive	8.90	3.59000	1.000	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	
2300 MH/RV	9.93	0.49900	1.000	0.00%	0.00%	41.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	8.94	0.00	0.00	0.00	0.00	0.00	0.00	
Primamelt 37-155	8.00	0.37500	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	
Econobond Adhesive	5.76	1.49900	1.000	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	5.67	0.00	0.00	0.00	0.00	
Spray-N-Go Enamel	6.26	0.12500	1.000	10.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.34	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.10	
502 Silicone Sealant	8.51	0.25000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Z Shield 7800	9.60	0.12500	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Mineral Spirits 150	6.62	0.25000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Lacquer Thinner	6.74	0.25000	1.000	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	2.58	0.00	0.00	0.00	0.00	0.00	0.74	0.00	
<b>Potential Emissions:</b>												<b>2.53</b>	<b>2.79</b>	<b>8.94</b>	<b>0.06</b>	<b>5.67</b>	<b>0.01</b>	<b>0.74</b>	<b>1.20</b>		

**Worst Single HAP: 8.94 Tetrachloroethylene  
Combined HAPs: 21.94**

**Note:**

\*Based on manufacturer's specifications, the SIA-115 Adhesive has an approximate cure time of 17 minutes at 60°F and a negligible evaporation rate. Therefore, potential VOC (MDI) emissions are assumed to be minimal.

**Methodology:**

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

**Appendix A: Emission Calculations  
Particulate Emissions from Woodworking Operations**

**Company Name:** EverGreen Recreational Vehicles, LLC  
**Address City IN Zip:** 51700 Lovejoy Drive, Middlebury, IN 46540  
**Permit Number:** M039-31359-00719  
**Pit ID:** 039-00719  
**Reviewer:** Sarah Street  
**Date:** 1/18/2012

Process ID	Control Efficiency	Grain Loading	Air Flow Rate	Uncontrolled Emissions		Controlled Emissions		Process Weight Rate (lb/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lb/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (tons per year)
	(%)			(gr/acfm)	(acfm)	(lb/hr)	(tons/yr)			
WWDC2	99.00%	0.0015	8,500	10.93	47.87	0.11	0.48	825	2.27	9.92
									(will be able to comply)	

**Note:**

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.

**Methodology:**

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) \* Fan Flow Rate (acfm) \* 60 min/hr \* 1 lb/7,000 grains / (1 - Control Efficiency) \* 8760 hr/yr \* 1 ton/2,000 lbs  
 Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) \* Fan Flow Rate (acfm) \* 60 min/hr \* 1 lb/7,000 grains \* 8760 hr/yr \* 1 ton/2,000 lbs

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

$$E = 4.1 * P^{0.67} \quad \text{where:} \quad E = \text{allowable PM emission rate (lb/hr)}$$

$$P = \text{process weight rate (tons/hr)}$$

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name: EverGreen Recreational Vehicles, LLC**  
**Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540**  
**Permit Number: M039-31359-00719**  
**Plt ID: 039-00719**  
**Reviewer: Sarah Street**  
**Date: 1/18/2012**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Electrode Consumption (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
TIG- Aluminum	8	0.60	4.80	5.20E-03	3.18E-04	1.00E-06	1.00E-06	2.50E-02	1.53E-03	4.80E-06	4.80E-06	0.002
Stick Welding	0	0.10	0.00	2.41E-02	3.40E-04	1.00E-06	1.00E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.02				0.002
Potential Emissions lbs/day								0.60				0.037
Potential Emissions tons/year								0.11				0.007

**Methodology:**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name: EverGreen Recreational Vehicles, LLC**  
**Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540**  
**Permit Number: M039-31359-00719**  
**Plt ID: 039-00719**  
**Reviewer: Sarah Street**  
**Date: 1/18/2012**

	# Units	Heat Input Capacity per unit (MMBtu/hr)	Total Heat Input Capacity (MMBtu/hr)
Forced Air Space Heater	1	0.600	0.60
Radiant Tube Heaters	30	0.201	6.03
			6.63

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	<u>mmBtu</u> mmscf	MMCF/yr
6.63	1000	58.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.22	0.22	0.02	2.90	0.16	2.44

\*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 following page for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: EverGreen Recreational Vehicles, LLC**  
**Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540**  
**Permit Number: M039-31359-00719**  
**Plt ID: 039-00719**  
**Reviewer: Sarah Street**  
**Date: 1/18/2012**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	6.098E-05	3.485E-05	2.178E-03	5.227E-02	9.873E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.452E-05	3.194E-05	4.066E-05	1.103E-05	6.098E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See following page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Greenhouse Gas Emissions**

**Company Name:** EverGreen Recreational Vehicles, LLC  
**Address City IN Zip:** 51700 Lovejoy Drive, Middlebury, IN 46540  
**Permit Number:** M039-31359-00719  
**Plt ID:** 039-00719  
**Reviewer:** Sarah Street  
**Date:** 1/18/2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,485	0.1	0.1
Summed Potential Emissions in tons/yr	3,485		
CO2e Total in tons/yr	3,506		

**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.  
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$   
 $CO2e (tons/yr) = CO2 Potential Emission ton/yr \times CO2 GWP (1) + CH4 Potential Emission ton/yr \times CH4 GWP (21) + N2O Potential Emission ton/yr \times N2O GWP (310).$

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: EverGreen Recreational Vehicles, LLC  
Address City IN Zip: 51700 Lovejoy Drive, Middlebury, IN 46540  
Permit Number: M039-31359-00719  
Plt ID: 039-00719  
Reviewer: Sarah Street  
Date: 1/18/2012**

**Paved Roads**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	5.0	5.0	15.0	75.0	550	0.104	0.5	190.1
Vehicle (leaving plant) (one-way trip)	1.0	5.0	5.0	15.0	75.0	550	0.104	0.5	190.1
<b>Total</b>			<b>10.0</b>		<b>150.0</b>			<b>1.0</b>	<b>380.2</b>

Average Vehicle Weight Per Trip =  $\frac{15.0}{0.10}$  tons/trip  
Average Miles Per Trip =  $\frac{0.10}{0.10}$  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$

where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	0.42	0.08	0.01	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.38	0.07	0.01	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
	<b>0.08</b>	<b>0.02</b>	<b>0.00</b>	<b>0.07</b>	<b>0.01</b>	<b>0.00</b>

**Methodology**

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
- Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particle Matter (<2.5 um)
- PTE = Potential to Emit



# 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](http://www.idem.IN.gov)

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

**TO:** Steve Crawford  
EverGreen Recreational Vehicles, LLC  
P.O. Box 52  
Middlebury, IN 46540

**DATE:** April 3, 2012

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

**SUBJECT:** Final Decision  
New Source Construction and Minor Source Operating Permit  
039-31359-00719

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:  
Nate Black, Consultant  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	PWAY 4/3/2012 EverGreen RV LLC 039-31359-00719 (final)		<b>CERTIFICATE OF MAILING ONLY</b>	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		

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		Steve Crawford EverGreen RV LLC PO Box 52 Middlebury IN 46540 (Source CAATS)										
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
3		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
4		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
6		Mr. Nate Black D & B Environmental Services, Inc. 401 Lincolnway W Osceola IN 46561 (Consultant)										
7												
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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