



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 4, 2013

RE: Forest River, Inc. (Tent Camper Division)

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 12/3/07



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Mr. William Conway Jr.
Forest River Inc. (Tent Camper Division)
3010 College Ave
Goshen, IN, 46526

June 4, 2013

Re: 039-32983-00471
First Minor Permit Revision to
MSOP No.: M039-26183-00471

Dear Mr. Conway:

Forest River Inc. (Tent Camper Division) was issued a Minor Source Operating Permit (MSOP) No. M039-26183-00471 on July 8, 2008 for a stationary recreational vehicle manufacturing source located at 201 W Elm Street and 66135 SR 13, Millersburg, IN 46543. On March 21, 2013 the Office of Air Quality (OAQ) received an application from the source related to the addition of a new recreational vehicle production building (Plant 4), consisting of a production line, a woodworking operation and one (1) space heater. This production line has the capacity to produce recreational vehicles at a rate of three (3) per hour. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit.

Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Forest River Inc. (Tent Camper Division)
Millersburg, Indiana
Permit Reviewer: Susann Brown

Page 2 of 2
MSOP MPR No. 039-32983-00471

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Susann Brown, of my staff, at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch

JK/sb



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Forest River Inc. (Tent Camper Division)
201 W Elm Street and 66135 SR 13
Millersburg, Indiana 46543

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-26183-00471	
Original Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 8, 2008 Expiration Date: July 8, 2018

First Minor Permit Revision No.: M039-32983-00471	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2013 Expiration Date: July 8, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary recreational vehicle manufacturing source.

Source Address:	201 W Elm Street and 66 135 SR 13, Millersburg, Indiana 46543
General Source Phone Number:	(574) 533-5934
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 Source Definition [326 IAC 1-2-73]

This stationary recreational vehicle manufacturing source consists of four plants:

- (a) Plants 1 and 4 are located at 201 West Elm Street, Millersburg, Indiana 46543; and
- (b) Plants 2 and 3 are located at 66135 S.R.13, Millersburg, Indiana 46543.

Since the four (4) plants are located on contiguous or adjacent properties, have the same SIC code of 37, and are under common control of the same entity, they will be considered one (1) source.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Production Area, identified as Plant 1, constructed prior to 1980, with a maximum capacity of one hundred ninety-two (192) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.
- (b) One (1) Production Area, identified as Plant 4, approved for construction in 2013, with a maximum capacity of three (3) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.
- (c) Two (2) recreational vehicle roof and wall lamination press operations, having a maximum laminating capacity of one hundred ninety-two (192) recreational vehicles per day. This facility was constructed prior to 1980. (Plant 1)
- (d) One (1) hot melt laminator, constructed in 2007, capable of processing 120 sheets (each luan sheet size is 4'x7' and weighs 11 pounds) luan sheets per hour. (Plant 3)
- (e) Two (2) bead applicators, each capable of pre-processing 80 (30'x7') side walls or roofs per day. (Plant 3)

- (f) Two (2) metal inert gas (MIG) welding operations consisting of two (2) welding stations, each consuming a maximum of 0.09 pounds of electrode per hour. This facility was constructed prior to 1980. (Plant 1)
- (g) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack B. This facility was constructed prior to 1980. (Plant 2)
- (h) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack A. This facility was constructed prior to 1980. (Plant 1)
- (i) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack D. This facility is permitted for construction in 2013 (Plant 4).
- (j) Milling operations for the roof and wall construction operations, including an upright panel saw, an arm saw, a table saw, and a radial arm router, controlled by a dust collector (cyclone and baghouse in series), constructed in 2007, and exhausting to stack C. Each milling operation has a maximum throughput capacity of 5,964 pounds of luan per hour. (Plant 3)
- (k) Five (5) natural gas fired space heaters with a total rated maximum capacity of 13.50 million British thermal unit (MMBtu/hr), exhausting at stacks A1, A2, A3, A4, and A5, respectively. These units were installed in 1975. (Plant 1)
- (l) Two (2) natural gas fired space-heating units, constructed in 2003, with a total rated maximum capacity of 1.80 million British thermal unit (MMBtu/hr), and both exhausting to stack EA-1. (Plant 2)
- (m) Two (2) natural gas fired space heaters, constructed in 2007, each with a heat input capacity of 1.25 MMBtu per hour, each exhausting to its respective stack, identified as stacks EA-2 and EA-3, respectively. (Plant 3)
- (n) One (1) natural gas fired space-heating unit, permitted in 2013, with a total rated maximum capacity of 3.4 million British thermal unit (MMBtu/hr). (Plant 4)
- (o) Unpaved roads and parking lots

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M039-26183-00471, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M039-26183-00471 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.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) 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) Production Area, identified as Plant 1, constructed prior to 1980, with a maximum capacity of one hundred ninety-two (192) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.
- (b) One (1) Production Area, identified as Plant 4, approved for construction in 2013, with a maximum capacity of three (3) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.
- (c) Two (2) recreational vehicle roof and wall lamination press operations, having a maximum laminating capacity of one hundred ninety-two (192) recreational vehicles per day. This facility was constructed prior to 1980. (Plant 1)
- (d) One (1) hot melt laminator, constructed in 2007, capable of processing 120 sheets (each luan sheet size is 4'x7' and weighs 11 pounds) luan sheets per hour. (Plant 3)
- (e) Two (2) bead applicators, each capable of pre-processing 80 (30'x7') side walls or roofs per day. (Plant 3)

(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]

- (a) Pursuant to 326 IAC 8-2-9(c), VOC emissions from the two (2) Production Areas, identified as Plant 1 and Plant 4, shall not exceed the following, when coating metal parts and products:
 - (1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings.
 - (2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
 - (3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.
 - (4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) emission limitation in 1 through 4 above apply to a specific coating, then the least stringent emission limitation shall be applicable.

- (b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not 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.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds

The VOC composition of coatings as applied shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC limits in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis, for each individual line.

This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

The Permittee is not required to determine volume weighted average of coatings for a given day, if compliant coatings are used on that day.

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below, for each coating line. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent; and
 - (3) The volume weighted average VOC content of the coatings used for each day. (The Permittee is not required to maintain a record of volume weighted average VOC content of the coatings for a given day, if compliant coatings are used on that day).
- (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:

- (f) Two (2) metal inert gas (MIG) welding operations consisting of two (2) welding stations, each consuming a maximum of 0.09 pounds of electrode per hour. This facility was constructed prior to 1980. (Plant 1)
- (g) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack B. This facility was constructed prior to 1980. (Plant 2)
- (h) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using baghouses as control and exhausting to stack A. This facility was constructed prior to 1980. (Plant 1)
- (i) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack D. This facility is permitted for construction in 2013 (Plant 4).
- (j) Milling operations for the roof and wall construction operations, including an upright panel saw, an arm saw, a table saw, and a radial arm router, controlled by a dust collector (cyclone and baghouse in series), constructed in 2007, and exhausting to stack C. Each milling operation has maximum throughput capacity is 5,964 pounds of luan per hour. (Plant 3)
- (k) Five (5) natural gas fired space heaters with a total rated maximum capacity of 13.50 million British thermal unit (MMBtu/hr), exhausting at stacks A1, A2, A3, A4, and A5. These units were installed in 1975. (Plant 1)
- (l) Two (2) natural gas fired space-heating units, constructed in 2003, with a total rated maximum capacity of 1.80 million British thermal unit (MMBtu/hr), and both exhausting to stack EA-1. (Plant 2)
- (m) Two (2) natural gas fired space heaters, constructed in 2007, each with a heat input capacity of 1.25 MMBtu per hour, each exhausting to its respective stack, identified as stacks EA-2 and EA-3, respectively. (Plant 3)
- (n) One (1) natural gas fired space-heating unit, permitted in 2013, with a total rated maximum capacity of 3.4 million British thermal unit (MMBtu/hr). (Plant 4)

(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 6-3-2]

D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.2.2 Particulate Control

In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the Plant 1, 2, and 3 Woodworking Operations, or the Plant 3 Milling Operation, the baghouses for particulate control shall be in operation and control emissions from the associated woodworking processes at all times the woodworking processes are in operation.

Compliance Monitoring Requirements

D.2.3 Broken or Failed Bag Detection

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

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Forest River Inc. (Tent Camper Division)
Address:	201 W Elm Street and 66 135 SR 13
City:	Millersburg, Indiana 46543
Phone #:	(574)533-5934
MSOP #:	M039-26183-00471

I hereby certify that Forest River Inc. (Tent Camper Division) is : still in operation.
 no longer in operation.

I hereby certify that Forest River Inc. (Tent Camper Division) is : in compliance with the requirements of MSOP M039-26183-00471.
 not in compliance with the requirements of MSOP M039-26183-00471.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Description and Location

Source Name:	Forest River Inc. (Tent Camper Division)
Source Location:	201 W Elm St and 66135 SR 13 Millersburg, IN 46543
County:	Elkhart
SIC Code:	3792 (Travel Trailers and Campers)
Operation Permit No.:	M039-26183-00471
Operation Permit Issuance Date:	July 8, 2008
Minor Permit Revision No.:	039-32983-00471
Permit Reviewer:	Susann Brown

On March 21, 2013, the Office of Air Quality (OAQ) received an application from Forest River Inc. (Tent Camper Division) related to the addition of a new recreational vehicle production building (Plant 4), consisting of a production line, a woodworking operation and one (1) space heater.

Source Definition

This stationary recreational vehicle manufacturing source consists of the following existing plants:

- (a) Plants 1 is located at 201 West Elm Street, Millersburg, Indiana 46543; and
- (b) Plants 2 and 3 are located at 66135 S.R.13, Millersburg, Indiana 46543.

The source is adding the following plant:

- (a) Plant 4 is located at 201 West Elm Street, Millersburg, Indiana 46543.

In order to consider all plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

Since the four (4) plants are located on contiguous or adjacent properties, have the same SIC code of 37, and are under common control of the same entity, they will be considered one (1) source.

Existing Approvals

The source has been operating under MSOP Renewal No. M039-26183-00471, issued July 8, 2008.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

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

- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ 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, hazardous air pollutants, and greenhouse gases 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.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e*	Total HAPs	Worst Single HAP
Space Heaters	0.15	0.59	0.59	0.05	7.80	0.43	6.55	9,228	0.15	0.14 (hexane)
Woodworking Shops - Plant 1 and Plant 2	51.06	51.06	51.06	-	-	-	-	-	-	-
RV Assembly Area - Plant 1	1.05	1.05	1.05	-	-	49.28	-	-	16.12	9.53 (toluene)
RV Roof and Wall Lamination - Plant 1	-	-	-	-	-	0.11	-	-	0.11	0.11 (MDI)
Milling Operations - Plant 3	10.02	4.01	4.01	-	-	-	-	-	-	-
Hot melt lamination - Plant 3	-	-	-	-	-	Negl.	-	-	Negl.	-
Bead applicators - Plant 3	-	-	-	-	-	Negl.	-	-	Negl.	Negl.
Welding Process - Plant 1	0.01	0.01	0.01	-	-	-	-	-	Negl.	-
Total PTE of Entire Source	62.28	56.71	56.71	0.05	7.80	49.82	6.55	-	16.27	9.53 (toluene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA
Negl. = negligible These emissions are based upon Appendix A of the TSD to MSOP Renewal No.: M039-26183-00471 issued July 8, 2008. *PM2.5 and GHGs as CO ₂ e were not required to be calculated during the permitting of MSOP Renewal M039-26183-00471.										

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River Inc. (Tent Camper Division) on March 21, 2013 relating to the construction of a facility (Plant 4), consisting of a production line, a woodworking operation and one (1) space heater.

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

- (a) One (1) Production Area, identified as Plant 1, constructed prior to 1980, with a maximum capacity of one hundred ninety-two (192) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.

Note: This description has been revised because the description of the Plant 1 Production Area was incorrect in M039-26183-00471, issued July 8, 2008.

- (b) Two (2) recreational vehicle roof and wall lamination press operations, having a

- maximum laminating capacity of one hundred ninety-two (192) recreational vehicles per day. This facility was constructed prior to 1980. (Plant 1)
- (c) One (1) hot melt laminator, constructed in 2007, capable of processing 120 sheets (each luan sheet size is 4'x7' and weighs 11 pounds) luan sheets per hour. (Plant 3)
 - (d) Two (2) bead applicators, each capable of pre-processing 80 (30'x7') side walls or roofs per day. (Plant 3)
 - (e) Two (2) metal inert gas (MIG) welding operations consisting of two (2) welding stations, each consuming a maximum of 0.09 pounds of electrode per hour. This facility was constructed prior to 1980. (Plant 1)
 - (f) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack B. This facility was constructed prior to 1980. (Plant 2)
 - (g) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack A. This facility was constructed prior to 1980. (Plant 1)
 - (h) Milling operations for the roof and wall construction operations, including an upright panel saw, an arm saw, a table saw, and a radial arm router, controlled by a dust collector (cyclone and baghouse in series), constructed in 2007, and exhausting to stack C. Each milling operation has a maximum throughput capacity of 5,964 pounds of luan per hour. (Plant 3)
 - (i) Five (5) natural gas fired space heaters with a total rated maximum capacity of 13.50 million British thermal unit (MMBtu/hr), exhausting at stacks A1, A2, A3, A4, and A5, respectively. These units were installed in 1975. (Plant 1)
 - (j) Two (2) natural gas fired space-heating units, constructed in 2003, with a total rated maximum capacity of 1.80 million British thermal unit (MMBtu/hr), and both exhausting to stack EA-1. (Plant 2)
 - (k) Two (2) natural gas fired space heaters, constructed in 2007, each with a heat input capacity of 1.25 MMBtu per hour, each exhausting to its respective stack, identified as stacks EA-2 and EA-3, respectively. (Plant 3)

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

- (l) One (1) Production Area, identified as Plant 4, approved for construction in 2013, with a maximum capacity of three (3) recreational vehicles per hour, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors
- (m) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack D. This facility is permitted for construction in 2013 (Plant 4).
- (n) One (1) natural gas fired space-heating unit, permitted in 2013, with a total rated maximum capacity of 3.4 million British thermal unit (MMBtu/hr). (Plant 4)
- (o) Unpaved roads and parking lots

As of July 1, 2012, the EPA has mandated that all sources must be evaluated for greenhouse gas emissions. Therefore, greenhouse gas emissions are included in this revision for existing combustion sources.

“Integral Part of the Process” Determination

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

For purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from all woodworking operations were calculated before consideration of controls.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE after consideration of integral controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Natural Gas Heaters	0.03	0.11	0.11	0.01	1.49	0.08	1.25	1,798	0.03	0.03 (hexane)
Woodworking Operations	0.07	0.07	0.07	-	-	-	-	-	-	-
RV Assembly Area - Plant 4	0.39	0.39	0.39	-	-	18.84	-	-	4.05	1.57 (toluene)
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-
Total PTE of Proposed Revision	0.89	0.68	0.59	0.01	1.49	18.93	1.25	1,798	4.07	1.57 (toluene)

Pursuant to 326 IAC 2-6.1-6(g)(3), this MSOP is revised through Minor Permit Revision because the addition of a new production building (Plant 4) results in the potential to emit within the following ranges:

- (a) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of VOC.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Natural Gas Heaters	0.15 0.18	0.59 0.71	0.59 0.71	0.06	7.80 9.29	0.43 0.51	6.55 7.80	9,228 11,211	0.15 0.18	0.14 0.17 (hexane)
Woodworking Operations***	61.12 1.12	55.11 1.12	55.11 1.12	-	-	-	-	-	-	-
RV Assembly Area - Plants 1 and 4****	1.05 1.44	1.05 1.44	1.05 1.44	-	-	49.28 65.07	-	-	16.12 14.83	9.53 5.77 (toluene)
Lamination	-	-	-	-	-	0.11	-	-	0.11	0.11 (MDI)
Welding	0.01	0.01	0.01	-	-	-	-	-	Negl.	Negl.
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	61.07 3.15	56.71 3.38	56.71 3.29	0.06	7.8 9.29	49.8 65.69	6.5 7.80	9,288 11,211	16.27 15.11	9.53 5.77 (toluene)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

Negl. = negligible

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

**The 100,000 CO₂e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

***The woodworking operation's bag control devices are considered integral to the process. Therefore, the particulate matter PTE listed is after consideration of control. The PTE of the Milling Operations have been combined into the Woodworking Operations row.

**** The source has switched to coatings containing lower HAP contents, which is why the HAP PTE from the RV Assembly operations have decreased from those calculated for MSOP Renewal M039-26183-00471.

The RV Roof and Wall Lamination and Hot Melt Lamination PTE have been combined into a single table row.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Natural Gas Heaters	0.18	0.71	0.71	0.06	9.29	0.51	7.80	11,211	0.18	0.17 (hexane)
Woodworking Operations***	1.12	1.12	1.12	-	-	-	-	-	-	-
RV Assembly Area - Plants 1 and 4****	1.44	1.44	1.44	-	-	65.07	-	-	14.83	5.77 (toluene)
Lamination	-	-	-	-	-	0.11	-	-	0.11	0.11 (MDI)
Welding	0.01	0.01	0.01	-	-	-	-	-	Negl.	Negl.
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	3.15	3.38	3.29	0.06	9.29	65.69	7.80	11,211	15.11	5.77 (toluene)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
Negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ***The woodworking operation's bag control devices are considered integral to the process. Therefore, the particulate matter PTE listed is after consideration of control. ****HAPs have decreased due to the usage of coatings with lower HAP content.										

MSOP Status

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be 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) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject-to-regulation

threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

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 60.390, Subpart MM, are not included in the permit because this source is not an automobile or light-duty truck assembly plant.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light-Duty Trucks, (40 CFR 63, Subpart IIII) (326 IAC 20-85) are not included, because this source does not apply surface coating materials to automobiles or light-duty trucks.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63 Subpart M MMM) are not included for this source, because this source is not a major source for HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4481, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not a major source for HAPs.
- (f) The requirements of the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63.11169, Subpart HHHHHH, is not included in the permit, since the surface coating facility does not perform paint stripping operations using methylene chloride, spray application of coating to motor vehicles and mobile equipment, or spray application of coatings to a plastic and/or metal substrate where the coatings contain any target HAP. The source uses roll, brush, and bead application methods.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability – Individual Facilities

The following state rules are applicable to the proposed revision:

- (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 modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326

IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

- (c) 326 IAC 2-3 (Emission Offset)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new recreational vehicle production building (Plant 4) is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 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.
- (f) 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.
- (g) 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.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Production Area Operation (Plant 4)

- (j) 326 IAC 6-3-2 (Particulate Emissions Limitations)
The Production Area Operation, identified as Plant 4, uses roll or brush coating, therefore, pursuant to 326 IAC 6-3-1(b)(6) and (8), 326 IAC 6-3-2 does not apply to the Production Area Operation.
- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The Production Area Operation, identified as Plant 4, is exempt from the requirements of 326 IAC 8-1-6 since Plant 4 does not have potential VOC emissions greater than or equal to twenty-five

(25) tons per year when coating substrates that are not otherwise regulated under other provisions of 326 IAC 8, 326 IAC 20-48, or 326 IAC 20-56.

- (l) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)
The Production Area Operation, identified as Plant 4, is exempt from the requirements of 326 IAC 8-2-2, since Plant 4 does not surface coat automobiles and light duty trucks.
- (m) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
The Production Area Operation, identified as Plant 4, performs metal coating and the source is classified as Standard Industrial Classification Code of major group #37. In addition, the source was constructed after July 1, 1990 and the production operation has actual VOC emissions greater than 15 pounds per day.
 - (1) Pursuant to 326 IAC 8-2-9(c), VOC emissions from the Production Area, identified as Plant 4, shall not exceed the following when coating metal parts and products:
 - (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings.
 - (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
 - (C) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.
 - (D) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) emission limitation in 1 through 4 above apply to a specific coating, then the least stringent emission limitation shall be applicable.

- (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:
 - (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (B) 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.
 - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (E) 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

- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the cabinet woodworking shop is exempt from the requirements of 326 IAC 6-3, because after consideration of integral controls, it has the potential to emit particulate matter emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Natural Gas Combustion

- (o) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired combustion units are not subject to 326 IAC 6-2 because they are not sources of indirect heating.
- (p) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The natural gas-fired combustion units are not subject to the requirements of 326 IAC 7-1.1, because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

Welding

- (q) 326 IAC 6-3-2 (Particulate Emissions Limitations)
The welding operations are not subject to the requirements of 326 IAC 6-3-2, because they use less than six hundred twenty-five (625) pounds of rod or wire per day.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M039-26183-00471, issued on July 8, 2008.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

...

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

The Permittee owns and operates a stationary recreational vehicles manufacturing source.

Source Address:	201 West Elm Street and 66135 S.R.13, Millersburg, Indiana 46543
Mailing Address:	P.O. Box 124, Goshen, IN 46527
General Source Phone Number:	(574) 533-5934
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 Source Definition [326 IAC 1-2-73]

This stationary recreational vehicles manufacturing source consists of ~~three~~ **four** plants:

- (a) Plants **1 and 4** ~~is are~~ located at 201 West Elm Street, Millersburg, Indiana 46543; and
- (b) Plants 2 and 3 are located at 66135 S.R.13, Millersburg, Indiana 46543.

Since the ~~three (3)~~ **four (4)** plants are located on contiguous or adjacent properties, have the same SIC code of 37, and are under common control of the same entity, they will be considered one (1) source, ~~effective from the date of issuance of this MSOP.~~

A.3 Emission Units and Pollution Control Equipment Summary

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

- ~~(a)~~ Two (2) high volume low pressure (HVLP) spray guns, various aerosol spray cans and manual tube extrusion guns for coating recreational vehicles in the assembly area, with a maximum manufacturing capacity of one hundred ninety-two (192) recreational vehicles per day, with no add-on control devices. This facility was constructed prior to 1980. (Plant 4)
- (a) One (1) Production Area, identified as Plant 1, constructed prior to 1980, with a maximum capacity of one hundred ninety-two (192) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.**
- (b) One (1) Production Area, identified as Plant 4, approved for construction in 2013, with a maximum capacity of three (3) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.**
- ~~(b)~~**(c)** Two (2) recreational vehicle roof and wall lamination press operations, having a maximum laminating capacity of one hundred ninety-two (192) recreational vehicles per day. This facility was constructed prior to 1980. (Plant 1)
- ~~(c)~~**(d)** One (1) hot melt laminator, constructed in 2007, capable of processing 120 sheets (each luan sheet size is 4'x7' and weighs 11 pounds) luan sheets per hour. (Plant 3)
- ~~(d)~~**(e)** Two (2) bead applicators, each capable of pre-processing 80 (30'x7') side walls or roofs per day. (Plant 3)
- ~~(e)~~**(f)** Two (2) metal inert gas (MIG) welding operations consisting of two (2) welding stations, each consuming a maximum of 0.09 pounds of electrode per hour. This facility was constructed prior to 1980. (Plant 1)
- ~~(f)~~**(g)** One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack B. This facility was constructed prior to 1980. (Plant 2)
- ~~(g)~~**(h)** One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack A. This facility was constructed prior to 1980. (Plant 1)
- (i) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five**

(235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack D. This facility is permitted for construction in 2013 (Plant 4).

- ~~(h)~~(j) Milling operations for the roof and wall construction operations, including an upright panel saw, an arm saw, a table saw, and a radial arm router, controlled by a dust collector (cyclone and baghouse in series), constructed in 2007, and exhausting to stack C. Each milling operation has a maximum throughput capacity of 5,964 pounds of luan per hour. (Plant 3)
- ~~(i)~~(k) Five (5) natural gas fired space heaters with a total rated maximum capacity of 13.50 million British thermal unit (MMBtu/hr), exhausting at stacks A1, A2, A3, A4, and A5, respectively. These units were installed in 1975. (Plant 1)
- ~~(j)~~(l) Two (2) natural gas fired space-heating units, constructed in 2003, with a total rated maximum capacity of 1.80 million British thermal unit (MMBtu/hr), and both exhausting to stack EA-1. (Plant 2)
- ~~(k)~~(m) Two (2) natural gas fired space heaters, constructed in 2007, each with a heat input capacity of 1.25 MMBtu per hour, each exhausting to its respective stack, identified as stacks EA-2 and EA-3, respectively. (Plant 3)
- (n) One (1) natural gas fired space-heating unit, permitted in 2013, with a total rated maximum capacity of 3.4 million British thermal unit (MMBtu/hr). (Plant 4)**
- (o) Unpaved roads and parking lots**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ~~(a)~~ Two (2) high volume low pressure (HVLP) spray guns, various aerosol spray cans and manual tube extrusion guns for coating recreational vehicles in the assembly area, with a maximum manufacturing capacity of one hundred ninety-two (192) recreational vehicles per day, with no add-on control devices. This facility was constructed prior to 1980. (Plant 1)
- (a) One (1) Production Area, identified as Plant 1, constructed prior to 1980, with a maximum capacity of one hundred ninety-two (192) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.**
- (b) One (1) Production Area, identified as Plant 4, approved for construction in 2013, with a maximum capacity of three (3) recreational vehicles per day, using rolling or brushing to coat recreational vehicles, using no controls, and exhausting indoors.**
- ~~(b)~~(c) Two (2) recreational vehicle roof and wall lamination press operations, having a maximum laminating capacity of one hundred ninety-two (192) recreational vehicles per day. This facility was constructed prior to 1980. (Plant 1)
- ~~(c)~~(d) One (1) hot melt laminator, constructed in 2007, capable of processing 120 sheets (each luan sheet size is 4'x7' and weighs 11 pounds) luan sheets per hour. (Plant 3)
- ~~(d)~~(e) Two (2) bead applicators, each capable of pre-processing 80 (30'x7') side walls or roofs per day. (Plant 3)

(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

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

- (a) Pursuant to 326 IAC 8-2-9(c), ~~(Miscellaneous Metal Coating), the permittee during the metal coating operations at assembly area located at plant 1 shall not discharge into the atmosphere VOC in excess of the followings:~~ **VOC emissions from the two (2) Production Areas, identified as Plant 1 and Plant 4, shall not exceed the following when coating metal parts and products:**

- (1) Four and three-tenths (4.3) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings.
- (2) Three and five-tenths (3.5) pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (3) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.
- (4) Three (3) pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) emission limitation in 1 through 4 above apply to a specific coating, then the least stringent emission limitation ~~above 1 through 4~~ shall be applicable.

- (b) Pursuant to 326 IAC 8-2-9(f), ~~solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~ **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.

Note:

This rule has been revised since the issuance of MSOP Renewal No. M039-26183-00471, issued July 8, 2008. The permit has been updated to reflect the revised rule.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities **and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.**

...

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC limits in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis, **for each individual line.**

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

...

D.1.5 Record Keeping Requirements

(a) To document **the compliance status** with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below, **for each coating line.** Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limits established in condition D.1.1.

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

(2) The amount of coating material and solvent used on daily basis.

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

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

(3) The volume weighted average VOC content of the coatings used for each day. (The Permittee is not required to maintain a record of volume weighted average VOC content of the coatings for a given day, if compliant coatings are used on that day).

(b) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **contains the Permittee's obligations with regard to the records required by this condition.**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(e)~~(f) Two (2) metal inert gas (MIG) welding operations consisting of two (2) welding stations, each consuming a maximum of 0.09 pounds of electrode per hour. This facility was constructed prior to 1980. (Plant 1)

~~(f)~~(g) One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack B. This facility was

	constructed prior to 1980. (Plant 2)
(g) (h)	One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using baghouses as control and exhausting to stack A. This facility was constructed prior to 1980. (Plant 1)
(i)	One (1) cabinet woodworking shop consisting of table saws, radial arm saws, and chop saws, having a maximum throughput capacity of two hundred and thirty-five (235) pounds of prefinished lumber per hour, using a baghouse as control and exhausting to stack D. This facility is permitted for construction in 2013 (Plant 4).
(h) (j)	Milling operations for the roof and wall construction operations, including an upright panel saw, an arm saw, a table saw, and a radial arm router, controlled by a dust collector (cyclone and baghouse in series), constructed in 2007, and exhausting to stack C. Each milling operation has maximum throughput capacity is 5,964 pounds of luan per hour. (Plant 3)
(i) (k)	Five (5) natural gas fired space heaters with a total rated maximum capacity of 13.50 million British thermal unit (MMBtu/hr), exhausting at stacks A1, A2, A3, A4, and A5. These units were installed in 1975. (Plant 1)
(j) (l)	Two (2) natural gas fired space-heating units, constructed in 2003, with a total rated maximum capacity of 1.80 million British thermal unit (MMBtu/hr), and both exhausting to stack EA-1. (Plant 2)
(k) (m)	Two (2) natural gas fired space heaters, constructed in 2007, each with a heat input capacity of 1.25 MMBtu per hour, each exhausting to its respective stack, identified as stacks EA-2 and EA-3, respectively. (Plant 3)
(n)	One (1) natural gas fired space-heating unit, permitted in 2013, with a total rated maximum capacity of 3.4 million British thermal unit (MMBtu/hr). (Plant 4)
(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 6-3-2]

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

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions shall not exceed pounds per hour limits as specified in the following table.~~

Process	Process Weight Rate for each operation (pounds of material processed per hour)	Particulate Emission Limit (pounds of particulate per hour)
Each Wood Working Operation at Plant 1	235	0.98
Each Wood Working Operation at Plant 2	235	0.98
Each Milling Operation at Plant 3	5964	8.53

Note:

After consideration of integral controls, each wood working and milling operation has particulate emissions less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14) the requirements of 326 IAC 6-3 are not applicable. Therefore the limits have been removed from the permit.

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

~~Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission from the welding operations at plant 2 shall not exceed 0.551 pounds per hour.~~

Note:

The welding operations consume less than six hundred twenty-five (625) pounds of rod or wire per day. Pursuant to 326 IAC 6-3-1(b)(9) the requirements of 326 IAC 6-3 are not applicable. Therefore this limit has been removed from the permit

~~D.2.31 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan is required for these facilities and their control devices., in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control devices. contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.~~

Compliance Determination Requirements

~~D.2.42 Particulate Control~~

~~In order to comply with Condition D.2.4 ensure the requirements of 326 IAC 6-3-2 are not applicable to the Plant 1, 2, and 3 Woodworking Operations, or the Plant 3 Milling Operation, the baghouses for particulate control shall be in operation and control emissions from the associated woodworking processes at all times the woodworking processes are in operation.~~

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

Compliance Monitoring Requirements

~~D.2.53 Broken or Failed Bag Detection~~

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

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

~~...~~

- ~~(b) The source requested a name change from Forest River, Inc. to Forest River Inc. (Tent Camper Division). The revised name has been updated throughout the permit documents.~~

- (c) IDEM, OAQ has made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
- (1) Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
 - (2) IDEM has revised the emission unit descriptions in Sections A.2 and D.1.
 - (3) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", in accordance with Section C", or other similar language to "Section C contains the Permittee's obligations with regard to the records required by this condition."
 - (4) IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except when the underlying rule states "within."
 - (5) IDEM has determined that rather than having a certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
 - (6) IDEM has clarified the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans. IDEM, OAQ has decided to clarify other aspects of Section B - Preventive Maintenance Plan
 - (7) IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
 - (8) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
 - (9) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
 - (10) IDEM has removed the first paragraph of Section C - Performance Testing because the specific testing conditions elsewhere in the permit will specify the timeline and procedures.
 - (11) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
 - (12) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted,

as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

- (13) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (14) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) ~~This permit, M039-26183-00471, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- (b) ~~If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

- (a) ~~the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or~~
- (b) ~~the emission unit to which the condition pertains permanently ceases operation.~~

B.4 Enforceability

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

~~B.5 Severability~~

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

~~B.6 Property Rights or Exclusive Privilege~~

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

~~B.7 Duty to Provide Information~~

~~(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

~~(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 Certification~~

~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~

~~(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

~~B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

- ~~(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.~~
- ~~(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:~~
- ~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251~~
- ~~(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~B.10 Preventive Maintenance Plan [326 IAC 1-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
- ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
- ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~
- ~~(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

~~B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

- ~~(a) All terms and conditions of permits established prior to M039-26183-00471 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~
- ~~(1) incorporated as originally stated,~~
- ~~(2) revised, or~~
- ~~(3) deleted.~~
- ~~(b) All previous registrations and permits are superseded by this permit.~~

~~B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.~~

~~B.13 Permit Renewal [326 IAC 2-6.1-7]~~

~~(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~(b) A timely renewal application is one that is:~~

~~(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and~~

~~(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

~~B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]~~

~~(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.~~

~~(b) Any application requesting an amendment or modification of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]~~

~~B.15 — Source Modification Requirement~~

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

~~B.16 — Inspection and Entry~~

~~[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]~~

~~Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:~~

- ~~(a) — Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- ~~(b) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;~~
- ~~(c) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~
- ~~(d) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- ~~(e) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

~~B.17 — Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]~~

- ~~(a) — The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- ~~(b) — Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) — The Permittee may implement notice only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]~~

~~B.18 Annual Fee Payment [326 IAC 2-1.1-7]~~

~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.~~

~~(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.19 Credible Evidence [326 IAC 1-1-6]~~

~~For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.~~

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

~~C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.~~

~~C.2 Permit Revocation [326 IAC 2-1.1-9]~~

~~Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:~~

~~(a) Violation of any conditions of this permit.~~

~~(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.~~

~~(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.~~

~~(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.~~

~~(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.~~

~~C.3 Opacity [326 IAC 5-1]~~

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

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

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

~~C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]~~

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.~~

~~C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]~~

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.~~

~~C.6 Fugitive Dust Emissions [326 IAC 6-4]~~

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

~~C.7 Stack Height [326 IAC 1-7]~~

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

~~C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) ~~Procedures for Asbestos Emission Control~~
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) ~~Demolition and Renovation~~
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) ~~Indiana Licensed Asbestos Inspector~~
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

- (b) ~~The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

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

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

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

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

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

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

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

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251~~

- ~~(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

- ~~(c) — Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(d) — Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

...

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M039-26183-00471, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) **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.**
- (d) **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

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

- (a) **All terms and conditions of permits established prior to M039-26183-00471 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) **incorporated as originally stated,**
 - (2) **revised, or**
 - (4) **deleted.****
- (b) **All previous registrations and permits are superseded by this permit.**

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) **The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Request for renewal shall be submitted to:

**Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

- (b) **A timely renewal application is one that is:
 - (1) **Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and****

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request.
[326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device

shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (c) 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

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

- (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) **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.**

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 March 21, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 039-32983-00471. The staff recommends to the Commissioner that this MSOP Minor Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (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

**TSD Appendix A: Emission Calculations
Revision Emissions**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street and 66135 S.R.13, Millersburg, IN 46543
Permit No: 039-32983-00471
Reviewer: Susann Brown
Date: April 2013

Process Description	Unlimited Potential to Emit (PTE) (tons/year) (Before Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.03	0.11	0.11	0.01	1.49	0.08	1.25	1,798	0.03	0.03	hexane
Woodworking Operations	3.42	3.42	3.42	-	-	-	-	-	-	-	-
RV Assembly Area - Plant 4	0.39	0.39	0.39	-	-	18.84	-	-	4.05	1.57	toluene
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-	-
Total PTE	4.24	4.03	3.93	0.01	1.49	18.93	1.25	1798	4.07	1.57	toluene

Process Description	Unlimited Potential to Emit (PTE) (tons/year) (After Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.03	0.11	0.11	0.01	1.49	0.08	1.25	1,798	0.03	0.03	hexane
Woodworking Operations	0.07	0.07	0.07	-	-	-	-	-	-	-	-
RV Assembly Area - Plant 4	0.39	0.39	0.39	-	-	18.84	-	-	4.05	1.57	toluene
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-	-
Total PTE	0.89	0.68	0.59	0.01	1.49	18.93	1.25	1798	4.07	1.57	toluene

Process Description	Controlled Potential to Emit (PTE) (tons/year) (After Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.03	0.11	0.11	0.01	1.49	0.08	1.25	1798	0.03	0.03	hexane
Woodworking Operations	0.07	0.07	0.07	-	-	-	-	-	-	-	-
RV Assembly Area - Plant 4	0.39	0.39	0.39	-	-	18.84	-	-	4.05	1.57	toluene
Unpaved Roads	0.26	0.07	0.01	-	-	-	-	-	-	-	-
Total PTE	0.75	0.64	0.58	0.01	1.49	18.93	1.25	1798	4.07	1.57	toluene

**Appendix A: Emission Calculations
Summary Emissions**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street and 66135 S.R.13, Millersburg, IN 46543
Permit No: 039-32983-00471
Reviewer: Susann Brown
Date: April 2013

Process Description	Unlimited Potential to Emit (PTE) (tons/year) (Before Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.18	0.71	0.71	0.06	9.29	0.51	7.80	11,211	0.18	0.17	hexane
Woodworking Operations	64.49	58.48	58.48	-	-	-	-	-	-	-	-
RV Assembly Area - Plants 1 and 4	1.44	1.44	1.44	-	-	65.07	-	-	14.83	5.77	toluene
Lamination	-	-	-	-	-	0.11	-	-	0.11	0.11	MDI
Welding	0.01	0.01	0.01	-	-	-	-	-	5.76E-07	5.72E-07	manganese
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-	-
Total PTE	66.52	60.74	60.65	0.06	9.29	65.69	7.80	11,211	15.11	5.77	toluene

Process Description	Unlimited Potential to Emit (PTE) (tons/year) (After Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.18	0.71	0.71	0.06	9.29	0.51	7.80	11,211	0.18	0.17	hexane
Woodworking Operations	1.12	1.12	1.12	-	-	-	-	-	-	-	-
RV Assembly Area - Plants 1 and 4	1.44	1.44	1.44	-	-	65.07	-	-	14.83	5.77	toluene
Lamination	-	-	-	-	-	0.11	-	-	0.11	0.11	MDI
Welding	0.01	0.01	0.01	-	-	-	-	-	5.76E-07	5.72E-07	manganese
Unpaved Roads	0.40	0.10	0.01	-	-	-	-	-	-	-	-
Total PTE	3.15	3.38	3.29	0.06	9.29	65.69	7.80	11,211	15.11	5.77	toluene

Process Description	Controlled Potential to Emit (PTE) (tons/year) (After Integral Woodworking Controls)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Natural Gas Heaters	0.18	0.71	0.71	0.06	9.29	0.51	7.80	11,211	0.18	0.17	hexane
Woodworking Operations	1.12	1.12	1.12	-	-	-	-	-	-	-	-
RV Assembly Area - Plants 1 and 4	1.44	1.44	1.44	-	-	65.07	-	-	14.83	5.77	toluene
Lamination	-	-	-	-	-	0.11	-	-	0.11	0.11	MDI
Welding	0.01	0.01	0.01	-	-	-	-	-	5.76E-07	5.72E-07	manganese
Unpaved Roads	0.26	0.07	0.01	-	-	-	-	-	-	-	-
Total PTE	3.01	3.34	3.28	0.06	9.29	65.69	7.80	11,211	15.11	5.77	toluene

**TSD Appendix A: Emission Calculations
Natural Gas Combustion Only (Heaters)
Capacity <100 MMBtu/hr**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No.: 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Plant ID	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
4	3,400	1000	29.78
Total	3,400	Total	29.78

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.11	0.11	0.009	1.49	0.08	1.25

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.1E-05	1.8E-05	1.1E-03	2.7E-02	5.1E-05	7.4E-06	1.6E-05	2.1E-05	5.7E-06	3.1E-05

*The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology	Potential Emission of Total HAPs (tons/yr)
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/1,020 MMBtu Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)2,000 lb/ton	0.03

Greenhouse Gases (GHGs)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	1,787	0.03	0.03
Summed Potential Emissions in tons/yr	1,787		
CO2e Total in tons/yr	1,798		

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

Plant ID	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
1	17,800	1000	155.93
Total	17,800	Total	155.93

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.15	0.59	0.59	0.05	7.80	0.43	6.55

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.6E-04	9.4E-05	5.8E-03	1.4E-01	2.7E-04	3.9E-05	8.6E-05	1.1E-04	3.0E-05	1.6E-04

*The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology	Potential Emission of Total HAPs (tons/yr)
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/1,020 MMBtu Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)2,000 lb/ton	0.15

Greenhouse Gases (GHGs)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	9,356	0.18	0.17
Summed Potential Emissions in tons/yr	9,356		
CO2e Total in tons/yr	9,413		

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

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC = Volatile Organic Compounds
CO = Carbon Monoxide
DCB = Dichlorobenzene
Pb = Lead
Cd = Cadmium
Cr = Chromium
Mn = Manganese
Ni = Nickel
CO2 = Carbon Dioxide
CH4 = Methane
N2O = Nitrous Oxide
CO2e = CO2 equivalent emissions

**Appendix A: Emissions Calculations
HAPs
From RV Assembly Area Located at Plant 1**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % Hexane	Weight % MIBK	Weight % Xylene	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Methanol	Hexane Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK (ton/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	Methanol (tons/yr)
Adhesive 676	6.26	0.00900	8.000	40.0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.79	0.00	0.00	0.00	0.00	0.00	0.00
Harder 792S	9.20	0.00078	8.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Reducer 8034S	7.50	0.00445	8.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS Cement	7.09	0.00136	8.000	0%	0.0%	0.00%	75.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00
ABS Cleaner	6.61	0.00039	8.000	0%	0.0%	0.00%	95.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00
Alpha Adhesive 8011	8.35	0.03110	3.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Latex Caulk 8010	8.50	0.30000	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S-W Latex Paint	9.00	0.00002	8.000	0%	0.0%	16.00%	0.0%	3.00%	3.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00019	0.00
phatic Resin Adhesive	9.49	0.08198	8.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Sealant 5113	8.92	0.00468	3.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Centari Paint	10.95	0.00250	8.000	0%	0.0%	20.00%	4.0%	11.00%	0.00	0.00	0.00	0.00	0.19	0.04	0.11	0.00	0.00
Chassis Black Paint	8.47	0.23300	8.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chroma Clear 760S	9.02	0.00078	8.000	0%	0.0%	17.00%	28.0%	28.00%	0.00	0.00	0.00	0.00	0.04	0.07	0.07	0.00	0.00
Denatured Alcohol	6.70	0.00078	8.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.19	0.02500	8.000	0%	10.0%	0.00%	10.0%	59.50%	0.00	9.90%	0.00	0.63	0.00	0.63	3.75	0.00	0.62
S-W G2C139	7.40	0.00117	8.000	0%	0.0%	0.00%	0.0%	40.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.12	0.00	0.00
Sealer	7.40	0.00078	8.000	0%	6.7%	13.62%	6.0%	30.70%	0.00	0.00%	0.00	0.01	0.03	0.01	0.06	0.00	0.00
Mineral Spirits	6.51	0.00389	8.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MEK	6.70	0.00389	8.000	0%	0.0%	0.00%	100.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.91	0.00	0.00	0.00
Par-sil-Silicone	8.76	0.95000	8.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RTV Sealant 732	8.76	0.02345	8.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Sealant 1016	13.01	0.00117	3.000	0%	0.0%	2.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spray n' Go Paint	6.09	0.00818	8.000	0%	0.0%	10.00%	10.0%	5.00%	3.00%	0.00%	0.00	0.00	0.17	0.17	0.09	0.05	0.00
Spot/Panel Clear Coat	7.94	0.00078	8.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Titeco Adhesive	6.10	0.03111	8.000	28%	0.0%	0.00%	0.000%	0.00	0.00	0.00	1.86	0.00	0.00	0.00	0.00	0.00	0.00
SUM											2.65	0.64	0.44	2.18	4.19	0.05	0.62

Individual HAP (Toluene): 4.19
Combined Total HAPs: 10.78

Methodology

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

**Appendix A: Emissions Calculations
HAPs
From RV Assembly Area Located at Plant 4**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % Hexane	Weight % MIBK	Weight % Xylene	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Methanol	Hexane Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK (ton/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	Methanol (tons/yr)
Adhesive 676	6.26	0.00900	3.000	40.0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00
Harder 792S	9.20	0.00078	3.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Reducer 8034S	7.50	0.00445	3.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS Cement	7.09	0.00136	3.000	0%	0.0%	0.00%	75.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00
ABS Cleaner	6.61	0.00039	3.000	0%	0.0%	0.00%	95.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Alpha Adhesive 8011	8.35	0.03110	3.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Latex Caulk 8010	8.50	0.30000	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S-W Latex Paint	9.00	0.00002	3.000	0%	0.0%	16.00%	0.0%	3.00%	3.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00007	0.00
phatic Resin Adhesive	9.49	0.08198	3.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Sealant 5113	8.92	0.00468	3.000	0%	0.0%	0.00%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Centari Paint	10.95	0.00250	3.000	0%	0.0%	20.00%	4.0%	11.00%	0.00	0.00	0.00	0.00	0.07	0.01	0.04	0.00	0.00
Chassis Black Paint	8.47	0.23300	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chroma Clear 760S	9.02	0.00078	3.000	0%	0.0%	17.00%	28.0%	28.00%	0.00	0.00	0.00	0.00	0.02	0.03	0.03	0.00	0.00
Denatured Alcohol	6.70	0.00078	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.19	0.02500	3.000	0%	10.0%	0.00%	10.0%	59.50%	0.00	9.90%	0.00	0.24	0.00	0.24	1.41	0.00	0.23
S-W G2C139	7.40	0.00117	3.000	0%	0.0%	0.00%	0.0%	40.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.05	0.00	0.00
Sealer	7.40	0.00078	3.000	0%	6.7%	13.62%	6.0%	30.70%	0.00	0.00%	0.00	0.01	0.01	0.00	0.02	0.00	0.00
Mineral Spirits	6.51	0.00389	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MEK	6.70	0.00389	3.000	0%	0.0%	0.00%	100.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.34	0.00	0.00	0.00
Par-sil-Silicone	8.76	0.95000	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RTV Sealant 732	8.76	0.02345	3.000	0%	0.0%	0.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alpha Sealant 1016	13.01	0.00117	3.000	0%	0.0%	2.00%	0.0%	0.00%	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spray n' Go Paint	6.09	0.00818	3.000	0%	0.0%	10.00%	10.0%	5.00%	3.00%	0.00%	0.00	0.00	0.07	0.07	0.03	0.02	0.00
Spot/Panel Clear Coat	7.94	0.00078	3.000	0%	0.0%	0.00%	0.000%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Titeco Adhesive	6.10	0.03111	3.000	28%	0.0%	0.00%	0.000%	0.00	0.00	0.00	0.70	0.00	0.00	0.00	0.00	0.00	0.00
SUM											0.99	0.24	0.17	0.82	1.57	0.02	0.23

Individual HAP (Toluene):

1.57

Combined Total HAPs:

4.05

Methodology

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

**Appendix A: Emission Calculations
Woodworking Operations at the Source**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson 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 from the woodworking operations were calculated after consideration of the controls for determining operating permit level.

Cabinet Shops at Plant 1 and Plant 2

Facility	PM/PM10/PM2.5						
	Air Flow Rate in baghouse (acf/m)	Grain Loading for baghouse (grains/acf)	Control Efficiency (%)	PTE Before Control (lb/hr)	PTE Before Control (ton/yr)	PTE After Control (lb/hr)	PTE After Control (ton/yr)
One (1) cabinet woodworking shop located at Plant 1	3400	0.004	98.0%	5.8	25.5	0.1	0.511
One (1) cabinet woodworking shop located at Plant 2	3400	0.004	98.0%	5.8	25.5	0.1	0.511

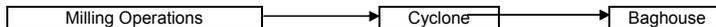
Methodology

PTE Before Control (lbs/hr) = Airflowrate (gr/acf) * Grain Loading (grains/acf) * 60 (min/hr) * 1/7000 (lb/grains)
PTE Before Control (ton/yr) = PTE Before Control (lbs/hr) * 8760 (hrs/yr) * 1/2000 (ton/lbs)
PTE After Control (ton/yr) = PTE Before Control (lbs/hr) * (1-Baghouse Control Efficiency)
PM/PM10/PM2.5 Control Equipment is Baghouse.
All PM emission is assumed to be PM10/PM2.5

Milling Operations at Plant 3

	PM10/PM2.5	PM
Control Efficiency of Baghouse	98.39%	98.39%
Control Efficiency of Cyclone	50.00%	80.00%

Emission units and control device configuration is as follows:



	Amount of PM10/PM2.5 Collected from Baghouse	PTE Before Control (Amount of PM10/PM2.5 going into Cyclone)	Amount of PM10/PM2.5 going into Baghouse	PTE After Control (Amount of PM10/PM2.5 leaving the Baghouse)
PM10				
Emission Rate (lb/hr)	0.45	0.91	0.46	0.01
Emission Rate (tons/year)	1.97	4.01	2.00	0.03

	Amount of PM Collected from Baghouse	PTE Before Control (Amount of PM going into Cyclone)	Amount of PM going into Baghouse	PTE After Control (Amount of PM leaving the Baghouse)
PM				
Emission Rate (lb/hr)	0.45	2.29	0.46	0.01
Emission Rate (tons/year)	1.97	10.02	2.00	0.03

Methodology

For PM

Amount of PM going into Baghouse = Amount of PM Collected from Baghouse / PM Control Efficiency of Baghouse
PTE Before Control (Amount of PM going into Cyclone) = Amount of PM going into Baghouse / (1-PM Control efficiency of Cyclone)
PTE After Control (Amount of PM leaving the Baghouse) = Amount of PM going into Baghouse * (1-PM control efficiency of Baghouse)

For PM10/PM2.5

Amount of PM10/PM2.5 going into Baghouse = Amount of PM10/PM2.5 Collected from Baghouse / PM10/PM2.5 Control Efficiency of Baghouse
PTE Before Control (Amount of PM10/PM2.5 going into Cyclone) = Amount of PM10/PM2.5 going into Baghouse / (1-PM10/PM2.5 Control efficiency of Cyclone)
PTE After Control (Amount of PM10/PM2.5 leaving the Baghouse) = Amount of PM10/PM2.5 going into Baghouse * (1-PM10/PM2.5 control efficiency of Baghouse)

**Appendix A: Emission Calculations
Woodworking Operations at the Source**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Cabinet Shop Plant 4

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM/PM10/PM2.5			
				PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls* (lb/hr)	PM Emission Rate after Controls* (tons/yr)
One (1) cabinet woodworking shop located at Plant 4	98.00%	0.00073	2500	0.78	3.42	0.02	0.07
Totals:				0.78	3.42	0.02	0.07

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
 Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Uncontrolled emissions

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
 Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

* In October 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 to produce its normal product and is integral to the normal operation of the facility, and therefore, potential emissions were to be calculated after consideration of the controls.

Appendix A: Emission Calculations
HAPs from RV Roof and Wall Lamination Press located at Plant 1

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Reaction:

15 % MDI + 85% PMDI + Water ----> 100% PMDI + Water + heat

Assume all MDI is lost without reaction:

Evaporation Rate (lb/hr) = 0.426

MDI emissions to the atmosphere in three minutes 0.0213 lb

*MDI lbs/gallon of Adhesive usage 0.0018 lb/gal

PTE

One Recreational Vehicle	=	1.71 gallon of Adhesive
8 RV/hr	=	0.0241 lbs/hr
		0.1056 ton/yr

* All HAP emitted from this process is MDI

Methodology

MDI emission in three (3) minutes = 0.426 lb HAP/hr * 0.05 hr

lbs HAP/gallon of Adhesive Usage = MDI emission in 3 minutes * 1/120 lbs spilled * 9.93 lbs spilled/ gallon

HAP lbs/hr for 8 RV = 1.71 gallon of Adhesive * 8 RV* lbs HAP/gallon of Adhesive usage

**Appendix A: Emission Calculations
Welding Operation**

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Process	Number of Stations	Max. Electrode Consumption (lbs/hr)	*EMISSION FACTORS (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPs (lbs/hr)
			PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Metal Inert Gas (MIG) Welding ER70S	2	0.18	0.0052	0.00318	0.00001	0.00001	1.87E-03	1.14E-03	3.60E-06	3.60E-06	1.15E-03

PM/PM10/PM2.5 (tons/yr) = 0.0082
HAPs (tons/yr) = 0.0050

*Emission Factors are from AP-42, Chapter 12.19, SCC 3-09-050

Methodology

Welding Emissions (lbs/hr) = (No. of Stations) * (Max. Electrode Consumption (lbs/hr) * Emission Factor (lb pollutant/lb electrode))
Welding Emissions (tons/yr) = Welding Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

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

Company Name: Forest River Inc. (Tent Camper Division)
Address City IN Zip: 201 West Elm Street, Millersburg, IN 46543
Permit No. 039-26183-00471
Reviewer: Susann Brown
Date: April 2013

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

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	1.0	1.0	20.0	20.0	900	0.170	0.2	62.2
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	26.0	26.0	900	0.170	0.2	62.2
Totals			2.0		46.0			0.3	124.4

Average Vehicle Weight Per Trip = tons/trip
Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, $E_f = k^*[(s/12)^a]*[(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	23.0	23.0	23.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$
where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	6.45	1.64	0.16	lb/mile
Mitigated Emission Factor, $E_{ext} =$	4.24	1.08	0.11	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)	0.20	0.05	0.01	0.13	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.20	0.05	0.01	0.13	0.03	0.00
Totals	0.40	0.10	0.01	0.26	0.07	0.01

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 = Particulate Matter (<2.5 um)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

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

TO: William Conway, Jr.
Forest River, Inc. (Tent Camper Division)
3010 College Avenue
Goshen, IN 46526

DATE: June 4, 2013

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

SUBJECT: Final Decision
Minor Permit Revision to MSOP
039-32983-00471

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Bill MacDonald, DECA Environmental & Associates, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	PWAY 6/4/2013 Forest River Inc. (Tent Camper Division) 039-32983-00471 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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1		William Conway Jr Forest River Inc. (Tent Camper Division) 3010 College Ave Goshen IN 46526 (Source CAATS)										
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
3		Millersburg Town Council P.O. Box 278, 201 West Washington Street Millersburg IN 46543 (Local Official)										
4		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
5		Mr. Bill MacDonald DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)										
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