INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: January 24, 2014

RE: Forest River, Inc., Shasta Division/039-33752-00094

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 6/13/13

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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Minor Source Operation Permit
OFFICE OF AIR QUALITY

Forest River Inc., Shasta Division
105 County Road 14
Middlebury, Indiana 46540

(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.: M039-33752-00094	
Issued by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 27, 2014 Expiration Date: January 27, 2019

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SECTION A SOURCE SUMMARY

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

A.1 General Information

The Permittee owns and operates a stationary pull-type Recreational Vehicle assembly and surface coating operation.

Source Address:	105 County Road 14, Middlebury, IN 46540
General Source Phone Number:	(260) 450-2363
SIC Code:	3792
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

Building 53

(a) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(b) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

Building 54

(c) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(d) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1)

table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

(e) Five (5) natural gas-fired space heaters, with a total maximum heat input capacity of 2.2 MMBtu/hr.

(f) One (1) lamination line, identified as L-1, approved for construction in 2010, using flow coating with a maximum capacity of 4.5 panels (30 ft x 7 ft per panel) per hour, using no controls, and exhausting indoors.

Building 410

(g) One (1) Recreational Vehicle (RV) assembly area, approved in 2014 for construction, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(h) One (1) woodworking area, approved in 2014 for construction, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

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, M039-33752-00094, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

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

(a) All terms and conditions of permits established prior to M039-33752-00094 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. The analog instrument shall be capable of measuring values outside of the normal range.

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

SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

Building 53

(a) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(b) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone exhausting indoors, processing 200 pounds per hour of lumber.

Building 54

(c) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(d) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone exhausting indoors, processing 200 pounds per hour of lumber.

Building 410

(g) One (1) Recreational Vehicle (RV) assembly area, approved in 2014 for construction, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(h) One (1) woodworking area, approved in 2014 for construction, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone exhausting indoors, processing 200 pounds per hour of lumber.

(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)(2)]

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

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume-weighted average volatile organic compound (VOC) content of coating delivered to the applicators when coating metal at the one (1) RV assembly line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

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

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

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

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

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

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

In order to ensure the Woodworking Areas in Buildings 53, 54, and 410 are exempt from the requirements of 326 IAC 6-3-2, a Preventive Maintenance Plan is required for these facility and any control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

Compliance with the VOC content limit 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. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

D.1.5 Particulate Control

In order to ensure the Woodworking Areas in Buildings 53, 54, and 410 are exempt from the requirements of 326 IAC 6-3-2, the cyclones for PM, PM10 and PM2.5 control shall be in operation and control emissions from the woodworking facilities at all times the facilities are in operation.

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

D.1.6 Cyclone Failure Detection

In the event that a cyclone malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.7 Cyclone Inspections

The Permittee shall perform semi-annual inspections of the cyclone controlling particulate from Woodworking Areas in Building 53, 54, and 410 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. A record shall be kept of the results of each inspection.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.

(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.

(3) The volume weighted average VOC content of the coatings used for each day;

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each day.

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain semi-annual records of inspections of the cyclones.

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

MSOP
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., Shasta Division
Address:	105 County Road 14
City:	Middlebury, IN 46540
Phone Number:	(260) 450-2363
MSOP No.:	M039-33752-00094

I hereby certify that Forest River Inc., Shasta Division :
☐ still in operation.
☐ no longer in operation.

I hereby certify that Forest River Inc., Shasta Division :
☐ in compliance with the requirements of MSOP No. 039-33752-00094.
☐ not in compliance with the requirements of MSOP No. 039-33752-00094.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Registration Transitioning to a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	**Forest River Inc. Shasta Division**
Source Location:	**150 County Rd 14, Middlebury, IN 46540**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**M039-33752-00094**
Permit Reviewer:	**Julie Alexander**

On December 20, 2013, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Forest River Inc. Shasta Division had applied to transition from a Registration to a Minor Source Operating Permit (MSOP) and to construct and operate new emission units at its existing modular home manufacturing plant. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit (MSOP) for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Additional Changes

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

(a) In November 2013, US EPA revised many GHG GWPs. These were effective at the federal level on January 1, 2014. Indiana State Part 70 (326 IAC 2-7) and Prevention of Significant Deteriorations (326 IAC 2-2) rules site specifically to the October 30, 2009 GWPs. The environmental board will adopt the updated GHG GWPs in a future meeting. Until then, IDEM has added the revised GHG GWPs to the calculations to ensure that the correct permit level was issued.

See Appendix A to the TSD Addendum for the revisions to the emissions calculations. The PTE of Proposed Revision table is amended as follows:

Revised Potential to Emit After Issuance

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

Pollutant	Potential To Emit (tons/year)
PM	2.90
PM10[(1)]	2.95
PM2.5[(1)]	2.95
SO_2	0.01
NO_x	0.94
VOC	47.10

Pollutant	Potential To Emit (tons/year)
CO	0.79
GHGs as CO_2e (11/29/2013)	**1,141**
GHGs as CO_2e **(10/30/2009)**	1,141

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
MDI	3.87E-01
Hexane	4.36E-01
Benzene	1.98E-05
Other	2.65
TOTAL HAPs	3.47

No change will be made to the original TSD. The OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Appendix A: Emission Calculations
Summary

Company Name: **Forest River Inc., Shasta Division**
ddress City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Uncontrolled Potential To Emit of the Entire Source-MSOP

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e based on 11/29/2013	CO2e based on 10/30/2009	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	-	3.45	3.84E-01	4.19E-01	-
Woodworking Areas	2.83	2.83	2.83	-	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01	1,140	1,141	0.02	-	1.70E-02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	-	2.62E-03	2.62E-03	-	-
Total	2.90	2.95	2.95	0.01	0.94	47.10	0.79	1,140	1,141	3.47	3.87E-01	4.36E-01	1.98E-05

Uncontrolled Potential To Emit of the Entire Source-PSD and CAM

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e based on 11/29/2013	CO2e based on 10/30/2009	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	-	3.45	3.84E-01	4.19E-01	-
Woodworking Areas	56.54	56.54	56.54	-	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01	1,140	1,141	1.78E-02	-	1.70E-02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	-	2.62E-03	2.62E-03	-	-
Total	56.61	56.66	56.66	0.01	0.94	47.10	0.79	1,140	1,141	3.47	3.87E-01	4.36E-01	1.98E-05

Potential To Emit of the Entire Source After Issuance

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e based on 11/29/2013	CO2e based on 10/30/2009	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	-	3.45	0.38	0.42	-
Woodworking Areas (MSOP)	2.83	2.83	2.83	-	-	-	-	-	-	-	-	-	-
Woodworking Areas (PSD and CAM)	*56.54*	*56.54*	*56.54*	-	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.07	0.07	0.01	0.94	0.05	0.79	1,140	1,141	0.02	-	0.02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	-	2.62E-03	2.62E-03	-	-
Total (MSOP)	2.90	2.95	2.95	0.01	0.94	47.10	0.79	1,140	1,141	3.47	3.87E-01	4.36E-01	1.98E-05
Total (PSD and CAM)	*56.61*	*56.66*	*56.66*	*0.01*	*0.94*	*47.10*	*0.79*	*1140*	*1141*	*3.47*	*3.87E-01*	*4.36E-01*	*1.98E-05*

Appendix A: Emission Calculations
Natural Gas Combustion Only

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
2.2	1020	18.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.984E-05	1.134E-05	7.085E-04	1.700E-02	3.212E-05	**1.778E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.724E-06	1.039E-05	1.323E-05	3.590E-06	1.984E-05	**5.177E-05**
					Total HAPs	**1.783E-02**
					Worst HAP	**1.700E-02**

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,134	2.17E-02	2.08E-02
Summed Potential Emissions in tons/yr	1,134		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	1,140		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	1,141		

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
RV Assembly Area VOC

Company Name: Forest River Inc., Shasta Division
Address City IN Zip: 105 County Road 14, Middlebury, Indiana 46540
Permit Number: M039-33752-00094
Reviewer: Julie Alexander
Date: October 10, 2013

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
ALPHA SYSTEMS 1021 LOW VOC ROOFING SEALANT	11.18	7.00E-01	4.500	2.45	7.72	185.33	33.82
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	8.30	1.59E-02	4.500	1.66	0.12	2.85	0.52
ALPHA SYSTEMS 5121, 5152, 5160, 511304P AlphaThane ULTRATATHANE Adhesive/Sealant	11.68	5.00E-03	4.500	0.12	0.00	0.06	0.01
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	9.59	3.00E-02	4.500	3.18	0.43	10.30	1.88
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	8.34	9.16E-02	4.500	0.17	0.07	1.64	0.30
ALPHA SYSTEMS P8010/P8011 WATER BASED EPDM RUBBER ROOFING ADHESIVE	8.35	1.56E-02	4.500	0.02	0.00	0.03	0.01
WD-40	5.9	1.00E-03	4.500	5.30	0.02	0.57	0.10
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	7.70E-03	4.500	0.92	0.03	0.77	0.14
CYCLO INDUSTRIES C33 SILICONE SPRAY	5.34	1.20E-03	4.500	3.35	0.02	0.43	0.08
DAP 12240 DAP Painter's Putty	18.45	1.26E-02	4.500	0.00	0.00	0.00	0.00
DAP 21141, 11008, 21146, 21161, 21181, 99941, 21177 WOOD DOUGH -ALL COLORS	12.30	2.10E-03	4.500	0.10	0.00	0.02	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	6.11	4.80E-03	4.500	5.10	0.11	2.64	0.48
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	10.01	1.87E-02	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	10.01	5.16E-02	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	9.17	2.10E-03	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	9.17	1.40E-03	4.500	0.00	0.00	0.00	0.00
GEOCEL 2300 CLEAR, 49100, 300102 2300 CLEAR SEALANT	7.76	7.00E-03	4.500	2.91	0.09	2.20	0.40
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	9.92	9.40E-03	4.500	4.62	0.20	4.69	0.86
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	9.85	2.11E-02	4.500	0.39	0.04	0.90	0.16
OATEY 30766, 30779,30782,30795,30805,32216,32217,32218, ABS CLEANER, 32219	6.76	1.00E-03	4.500	6.76	0.03	0.73	0.13
RECTORSEAL 25431, 25631, 75SS16, 22880, 5C RectorSeal No. 5 Soft Set Thread Sealant	11.50	1.60E-03	4.500	1.91	0.01	0.33	0.06
MINERAL SPIRITS	6.30	2.21E-02	4.500	6.30	0.63	15.04	2.74
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	6.08	1.68E-02	4.500	4.26	0.32	7.72	1.41
UNKNOWN IPA ISOPROPYL ALCOHOL	6.50	1.83E-02	4.500	6.50	0.54	12.85	2.34
WESTECH 340003 WES-STICKY CANS AND CANISTER	5.09	2.63E-02	4.500	3.05	0.36	8.66	1.58
			Potential to Emit of all 3 lines (tpy):		**10.74**	**257.77**	**47.04**
			Potential to Emit of of 1 line (tpy):		**3.58**	**85.92**	**15.68**

METHODOLOGY

Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
Potential VOC for 3 lines (lb/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
VOC emission rate per line (lbs/hr) = PTE of all 3 lines (lbs/hr) / 3 lines
Potential VOC for 3 lines (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
VOC emission rate per line (lb/day) = PTE of all 3 lines (lb/day) / 3 lines
Potential VOC for 3 lines (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
VOC emission rate per line (tons/yr) = PTE of all 3 lines (tons/yr) / 3 lines

Appendix A: Emission Calculations
RV Assembly Area PM and HAPs

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Particulate Potential (ton/yr)	Transfer Efficiency
WD-40	5.9	90%	1.00E-03	4.500	2.90E-03	75%
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	77%	7.70E-03	4.500	4.96E-02	75%
			Potential to Emit of all 3 lines (tpy):		5.25E-02	
			Potential to Emit of of 1 line (tpy):		1.75E-02	

Note:
Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
Particulate Potential for All 3 lines (ton/yr) = Density(Lb/Gal) x (1- Weight % Volatile (H20 & Organics)) x Gal of Mat. (gal/unit) x Maximum (unit/hour) x (1- transger efficiency (%)) x 8760 hr/yr / 2000 lbs/ton
Particulate Potential for 1 line = PTE for 3 lines (ton/yr)/ 3 lines
All coatings are applied manually using a brushes and rollers with 100% transfer efficiency. These coatings will not emit any particulate matter. WD-40 and Boring Smith Web 76, L7551 Adhesive are applied with a spray can as needed for touch-ups with a 75% transfer efficiency. WD-40 and Boring Smith Web 76, L7551 Adhesive will emit particulate matter.

Material	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % (MDI)	Weight % N-Butyl Phthalate	Weight % N-Hexane	Weight % Perchloroethylene	Weight % Toluene	Weight % Xylene
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	8.30	1.59E-02	4.50	0.00	0.00	3.00E-02	0.00	0.00	0.00	0.00
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	9.59	3.00E-02	4.50	0.00	0.00	0.00	0.00	0.00	0.32	0.00
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	8.34	9.61E-02	4.50	0.00	0.00	0.00	0.00	0.00	2.00E-02	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	10.01	2.44E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	9.85	2.41E-02	4.50	0.00	0.00	0.00	0.00	5.00E-02	0.00	0.00
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	10.01	1.87E-02	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	7.70E-03	4.50	0.00	0.00	0.00	0.25	0.00	0.00	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	6.11	4.80E-03	4.50	5.00E-02	0.00	0.00	0.00	0.00	5.00E-02	0.10
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	9.17	2.10E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	9.17	1.40E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	9.92	9.40E-03	4.50	0.00	0.00	0.00	0.00	5.00E-02	0.00	0.00
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	6.08	1.68E-02	4.50	0.00	0.00	0.00	0.10	0.00	0.00	0.00

Material	Ethyl Benzene (ton/yr)	(MDI) (ton/yr)	N-Butyl Phthalate (ton/yr)	N-Hexane (ton/yr)	Perchloroethylene (ton/yr)	Toluene (ton/yr)	Xylene (ton/yr)
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	0.00	0.00	7.80E-02	0.00	0.00	0.00	0.00
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	0.00	0.00	0.00	0.00	0.00	1.81	0.00
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	0.00	0.00	0.00	0.00	0.00	0.32	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	0.00	3.86E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	0.00	0.00	0.00	0.00	0.23	0.00	0.00
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	0.00	0.30	0.00	0.00	0.00	0.00	0.00
BORING SMITH WEB 76, L7551 ADHESIVE	0.00	0.00	0.00	0.22	0.00	0.00	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	2.89E-02	0.00	0.00	0.00	0.00	2.89E-02	5.78E-02
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	0.00	3.04E-02	0.00	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	0.00	2.02E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	0.00	0.00	0.00	0.00	9.19E-02	0.00	0.00
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	0.00	0.00	0.00	0.20	0.00	0.00	0.00
Potential to Emit of all 3 lines (tpy):	**2.89E-02**	**0.38**	**7.80E-02**	**0.42**	**0.33**	**2.16**	**5.78E-02**
Total HAPs of all 3 lines (tpy):	**3.45**						
Potential to Emit of all 1 lines (tpy):	**0.01**	**0.13**	**0.03**	**0.14**	**0.11**	**0.72**	**0.02**
Total HAPs of all 1 lines (tpy):	**1.15**						

Notes:
Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
HAPS emission rate for all 3 lines (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
HAPS emission rate per line (tons/yr) = PTE of all 3 lines (tons/yr) / 3 lines
All other coatings do not contain HAPs.

Appendix A: Emission Calculations
Woodworking

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Per One (1) Building			
Production Rate units/hr	Number of Units Produced Durning Collection	Sawdast Captured lbs	Amount collected lbs/unit
1.50	120	327	2.73

Per One (1) Building PM/PM10/PM2.5 PTE Before Integral Cyclone				3 Buildings Total
lbs/unit	lbs/hr	lbs/day	tons/year/building	tons/yr
2.87	4.30	103.26	18.85	56.54

Per One (1) Building PM/PM10/PM2.5 PTE After Integral Cyclone				3 Buildings Total
lbs/unit	lbs/hr	lbs/day	tons/year/building	tons/yr
0.14	0.22	5.16	0.94	2.83

Methodology:
Uncontrolled emissions = (Amount collected lb/unit) / (control efficiency)
Controlled emissions = (Uncontrolled emission rate lb/hr) x (1- control efficiency)
The woodworking areas are controlled by a cyclone. Cyclone controll efficiency is 95%.

Allowable Rate of Emissions

Woodworking Area	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Need an Integral Control Device to Exempt from 326 IAC 6-3-2?
Building 53	200	0.10	0.88	Yes
Building 54	200	0.10	0.88	Yes
Building 410	200	0.10	0.88	Yes

Methodology
Each line can process 200 pounds per hour of lumber
Allowable Emissions = 4.10(Process Weight Rate)^0.67

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

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

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

Assume all VOC is MDI

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

4.5 panels per hour * W =	5.990E-04	VOC/HAP pounds/hour
hourly emissions * 8760 hours/year * (1 ton/2000 lbs) =	2.624E-03	VOC/HAP tons/year

Assume all MDI is lost without reaction:

METHODOLOGY
The evaporation rate was determined using an equation developed by the Society of Plastic Industry (see TSD for more detail).
This methodolgy was used to determine the evaporation rate for a similar lamination process located at the Forest River, Inc. Millersburg facility (OAQ Permit #039-26183-00471, issued July 8, 2008).
$W = ((25.4)*(Pt^{o})*(MT)*(\mu^{0.78})*(A))/T$

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Forest River Inc. Shasta Division**
Source Location:	**150 County Rd 14, Middlebury, IN 46540**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**M039-33752-00094**
Permit Reviewer:	**Julie Alexander**

On October 04, 2013, the Office of Air Quality (OAQ) received an application from Forest River Inc. Shasta Division related to the construction and operation of new emission units at an existing modular home manufacturing plant and transition from a Registration to a MSOP.

Source Definition

Forest River, Inc., Shasta Division (formerly Pilgrim International), plant number 039-00094, 105 14th Street Middlebury, IN 46540 is a quarter mile from Forest River, Inc., Coachmen Division, plant number 039-00062, 423 North Main St, Middlebury, IN 46540. Forest River has many other plants in Elkhart County but they are all more than four miles from these two plants. IDEM, OAQ has examined whether the Shasta Division plant and the Coachman Division plant are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other(s); and,

(3) the plants must be located on contiguous or adjacent properties.

Both plants are owned by Forest River, Inc. Since common ownership exists, the first part of the definition is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the internet. Both plants have the two-digit SIC code, 37, for the major group of Transportation Equipment.

A plant is considered a support facility if at least fifty percent of its output is dedicated to another plant. Neither plant provides any output to the other plant. Neither plant qualifies as a support facility. However, since the plants have the same two-digit SIC Code they meet the second part of the major source definition.

The last criterion of the definition is whether the plants are on contiguous or adjacent properties. The Shasta Division plant is located a quarter mile from the Coachmen Division plant. The plants are not located on contiguous properties.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality regarding the term "adjacent".

This letter is in no way binding on IDEM, OAQ, but it is persuasive. Region VIII stated that any evaluation of what is "adjacent" must relate the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?

2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?

3. Is the production process itself split in any way between the plants?

No materials are routinely transferred between the plants. Each plant has its own manager and no employees shuttle back and forth between the plants. The production process is not split in any way between the plants. The plants operate independently of each other. Therefore the plants are not adjacent.

Since the plants do not meet the third part of the major source definition, IDEM, OAQ finds that the plants are not part of the same major source. The Shasta Division plant should be permitted separately from the Coachmen Division plant.

Based on the above, Office of Air Quality has decided to treat the two sources as separate. This source determination relies on the assumption that neither plant shall send any significant output to the other. This determination was initially made under Registration No. R039-29659-000943, issued on October 21, 2010.

Existing Approvals

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

(a) Registration No. R039-18601-00094, issued on February 10, 2004.

(b) Notice-Only Change No. 039-29659-00094, issued on October 21, 2010.

(c) Notice-Only Change No. 039-29945-00094, issued on December 30, 2010.

Due to this application, the source is transitioning from a Registration to a MSOP.

County Attainment Status

The source is located in Elkhart County.

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

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x 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 $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM_{10}, NO_2 amd Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River Inc. Shasta Division on October 04, 2013, relating to the construction and operation of new emission units at an existing modular home manufacturing plant and transition from a Registration to a MSOP.

The source consists of the following permitted emission units:

Building 53

(a) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(b) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

Building 54

(c) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(d) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

(e) Five (5) natural gas-fired space heaters, with a total maximum heat input capacity of 2.2 MMBtu/hr.

(f) One (1) lamination line, identified as L-1, approved for construction in 2010, using flow coating with a maximum capacity of 4.5 panels (30 ft x 7 ft per panel) per hour, using no controls, and exhausting indoors.

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

Building 410

(a) One (1) Recreational Vehicle (RV) assembly area, approved in 2014 for construction, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(b) One (1) woodworking area, approved in 2014 for construction, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone, processing 200 pounds per hour of lumber.

"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 were calculated after consideration of the controls for determining operating permit level purposes.

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

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

Pollutant	Potential To Emit (tons/year)
PM	2.76
PM10[(1)]	2.81
PM2.5[(1)]	2.81
SO_2	0.01
NO_x	0.94
VOC	47.10
CO	0.79
GHGs as CO_2e	1,141

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
MDI	3.87E-01
Hexane	4.36E-01
Benzene	1.98E-05
Other	2.65
TOTAL HAPs	**3.47**

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

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

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) This source performs surface coating operation on Recreational Vehicles with average vehicle weight of 7,483 pounds, which does not meet the definition of automobile or light duty truck as defined in 40 CFR 60.390. Therefore, it is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart MM) – Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(b) This source performs surface coating operation on Recreational Vehicles, which does not meet the definition of a business machine as defined in 40 CFR 60.721. Therefore, it is not subject to the requirements of the New Source Performance Standards for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 326 IAC 12 (40 CFR 60, Subpart TT).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) This source is not subject to the requirements of the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart IIII – Standards for Auto and Light Duty Trucks, because it is not involved in the surface coating of automobiles or light duty trucks.

(e) This source is not subject to the requirements of the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM – Standards for Miscellaneous Metal Parts and Products Surface Coating, because it is uses Non-HAP coatings. None of the coating used at the source contains more that 0.1% by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0% by mass for any other individual HAP.

(f) Pursuant to 40 CFR 63.4481 (c)(1), this source is not subject to the requirements of the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP – Standards for Plastic Parts Surface Coating, because it is uses Non-HAP coatings. None of the coating used at the source contains more that 0.1% by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0% by mass for any other individual HAP.

(g) This source is not subject to the requirements of the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, because it does not perform spray applied coating operations outside of using hand-held devices with a paint cup capacity of less than 3.0 fluid ounces and non-refillable aerosol containers.

(h) 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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

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

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

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

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

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

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

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

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 lb/hr of particulate matter (PM) are exempt from the requirements of 326 IAC 6-3-2. Each woodworking operation has a PTE less than 0.551 lbs/hr of PM. Therefore, the requirements of 326 IAC 6-3-2 do not apply to the woodworking operations.

(h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each new unit is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new unit is less than twenty-five (25) tons per year.

(i) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)
This source performs surface coating operation for RVs which have an average weight of 7,483 pounds, which does not meet the definition of “light duty trucks” as specified in 326 IAC 8-2-2(a). Therefore, 326 IAC 8-2-2 fdoes not apply.

(j) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume-weighted average volatile organic compound (VOC) content of coating delivered to the applicators when coating metal at the one (1) RV assembly line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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.

Compliance with this rule shall be achieved through daily volume weighted averaging of all coatings applied to metal substrates pursuant to 326 IAC 8-1-2(a)(7), by using the following equation:

$$A = [\Sigma (C \times U) / \Sigma U]$$

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.

Compliance Determination, Monitoring and Testing Requirements

The compliance determination requirements applicable to this source are as follows:

Volatile Organic Compounds (VOC)

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

(b) Compliance with the VOC content limit in 326 IAC 8-2-9 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

Particulate Control

In order to ensure the woodworking facilities are exempt from the requirements of 326 IAC 6-2-3, the cyclones for PM, PM10 and PM2.5 control shall be in operation and control emissions from the woodworking facilities at all times the woodworking facility is in operation.

The compliance monitoring requirements applicable to this source are as follows:

Cyclone Inspections

The Permittee shall perform semi-annual inspections of the cyclone controlling particulate from Woodworking Areas in Building 53, 54, and 410 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. A record shall be kept of the results of each inspection.

Proposed Changes

The changes listed below have been made to Registration No. R039-18601-00094. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Changes Throughout the Permit:

(a) *Multiple Conditions - Source Status*
Throughout the permit, language has been updated from the standard language for the registration to the current standard language for a MSOP.

(b) *Multiple Conditions - Typographical Errors, Language Clarification*
Throughout the permit, typographical and grammatical errors have been corrected. Additionally, changes to language for clarification or to align with the current preferred permit language conventions have been made.

Changes Specific to Section A:

(a) The Source Status located in Section A.1 has been updated to reflect the source's new status as an MOSP

(b) Section A.2 has been updated to include the new RV assembly area and the change in spray on coatings.

Section A of the permit has been revised as follows:

SECTION A SOURCE SUMMARY

This **permit** ~~registration~~ 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** ~~Registrant~~ 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** ~~Registrant~~ to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The **Permittee** ~~Registrant~~ owns and operates a stationary pull-type Recreational Vehicle assembly and surface coating operation.

***

Source Status: ~~Registration~~
Minor Source Operating Permit Program
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

****

(a) ***

(1) One (1) spray coating area for airless spray coating operation using WD-40 and ~~clear spray on enamel~~ **spray on adhesive**.

(2) ***

(b) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) gro**o**ve router, equipped with a cyclone **exhausting indoors**, processing 200 pounds per hour of lumber.

(c) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and ~~clear spray on enamel~~ **spray on adhesive**.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(d) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) gro**o**ve router, equipped with a cyclone **exhausting indoors**, processing 200 pounds per hour of lumber.

***

Building 410

(g) One (1) Recreational Vehicle (RV) assembly area, approved in 2014 for construction, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(h) One (1) woodworking area, approved in 2014 for construction, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone exhausting indoors, processing 200 pounds per hour of lumber.

Changes Specific to Section B and C:

Throughout the permit, language has been updated from the standard language for the registration to the current standard language for a MSOP. Section B and C of the permit has been revised as follows:

SECTION B GENERAL CONDITIONS

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

Terms in this ~~registration~~ **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 Effective Date of Registration [IC 13-15-5-3]~~

~~Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.~~

~~B.3 Registration Revocation [326 IAC 21.1-9]~~

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

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

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

~~(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 registration shall not require revocation of this registration.~~

~~(d) For any cause which establishes in the judgment of the fact that continuance of this registration is not consistent with purposes of this article.~~

B.**2**~~4~~ ~~Prior Permits Superseded [326 IAC 2-1.1-9.5](a)~~ **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, M039-33752-00094, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3~~5~~ **Term** of ~~permits~~ **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 ~~prior to Registration No. 039-18601-00094 and~~ **in a permit** issued pursuant to **a** permitting ~~programs~~ **program** approved ~~into~~ **in** the state implementation plan ~~have been either~~ **shall remain in effect until**:

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted.~~

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

(b) ~~All previous registrations~~ **the emission unit to which the condition pertains permanently ceases operation.**

B.4 Enforceability

Unless otherwise stated, all terms and ~~permits~~ conditions in this permit, including any provisions designed to limit the source's potential to emit, are ~~superseded~~ enforceable by ~~this registration.~~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-~~5~~**6**.1-~~2(f)(3)] [326 IAC 2-5.5-4(a)(3)]~~**5(a)(5)]**

~~Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):~~

(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 ~~registration~~ **permit**.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, ~~IN~~ **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.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]~~

~~Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.~~

~~B.7 Registrations [326 IAC 2-5.1-2(i)]~~

~~Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.~~

B.~~8~~**9** Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this ~~registration~~ **permit**, the ~~Registrant~~ **Permittee** shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this ~~registration~~ **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 ~~Registrant's~~ **Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the ~~Registrant~~ **Permittee** may extend the date an additional ninety (90) days provided the ~~Registrant~~ **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 ~~Registrant~~ **Permittee** shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the ~~Registrant~~ **Permittee** to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the ~~Registrant~~ **Permittee** is required by 40 CFR Part 60~~ or 40 CFR Part I~~63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such ~~OMM~~ 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 M039-33752-00094 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)]**~~5.1-2(g)] [326 IAC 2-5.5-4(b)]~~

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 ~~registration~~ **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 nonover lapping 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 ~~Registrant~~ **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. The analog instrument shall be capable of measuring values outside of the normal range.

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

Changes Specific to Section D and Forms:

(a) Section D.1 and the forms have been updated to reflect the source's new status as an MOSP

(b) Section D.1 has been updated to include the new RV assembly area.

(c) 326 IAC 6-3-2 has been updated in Section D.1 to include building emission limits and cyclone monitoring.

Section D and Forms of the permit has been revised as follows:

SECTION D.1 **EMISSION UNIT** OPERATION CONDITIONS

Emission Unit ~~Facility~~ Description ~~[326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:~~

(a) ***

(1) One (1) spray coating area for airless spray coating operation using WD-40 and ~~clear spray on enamel~~ **spray on adhesive**.

(2) ***

(b) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) gro**o**ve router, equipped with a cyclone **exhausting indoors**, processing 200 pounds per hour of lumber.

***

(c) One (1) Recreational Vehicle (RV) assembly area, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and ~~clear spray on enamel~~ **spray on adhesive**.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(d) One (1) woodworking area, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) gro**o**ve router, equipped with a cyclone **exhausting indoors**, processing 200 pounds per hour of lumber.

Building 410

(g) One (1) Recreational Vehicle (RV) assembly area, approved in 2014 for construction, with a maximum production capacity of 1.5 vehicles per hour, including the following:

(1) One (1) spray coating area for airless spray coating operation using WD-40 and spray on adhesive.

(2) Manual surface coating operation (non-spray) including extrusion, roll coating, brushing and wiping.

(h) One (1) woodworking area, approved in 2014 for construction, including the following equipment: one (1) pin router, two (2) belt sanders, three (3) drill presses, two (2) band saws, two (2) radial arm saws, one (1) table saw, eight (8) miter saws (chop saws), one (1) groove router, equipped with a cyclone exhausting indoors, processing 200 pounds per hour of lumber.

***

Emission Limitations and Standards ~~[326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]~~ **[326 IAC 2-6.1-5(a)(2)]**

~~D.1.2 Particulate [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed the following: 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.~~

~~Unit Description~~	~~Unit location~~	~~Max Throughput Rate (tons/hr)~~	~~Particulate Emission Limit (lbs/hr)~~
~~Woodworking Area~~	~~Building 53~~	~~0.10~~	~~0.88~~
	~~Building 54~~	~~0.10~~	~~0.88~~
	~~Building 410~~	~~0.10~~	~~0.88~~

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

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

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

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

D.1.~~3~~**2** Preventive Maintenance Plan ~~[326 IAC 2-5.5-4]~~ **[326 IAC 1-6-3]**

In order to ensure the Woodworking Areas in Buildings 53, 54, and 410 are exempt from the requirements of 326 IAC 6-3-2, a Preventive Maintenance Plan is required for **these** ~~this~~ facility and **any** ~~its~~ control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements ~~[326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]~~

D.1.~~4~~**3** Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

***

D.1.~~5~~**4** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

~~***~~

D.1.5 Particulate Control

In order to ensure the Woodworking Areas in Buildings 53, 54, and 410 are exempt from the requirements of 326 IAC 6-3-2, the cyclones for PM, PM10 and PM2.5 control shall be in operation and control emissions from the woodworking facilities at all times the facilities are in operation.

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

D.1.6 Cyclone Failure Detection

In the event that a cyclone malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.7 Cyclone Inspections

The Permittee shall perform semi-annual inspections of the cyclone controlling particulate from Woodworking Areas in Building 53, 54, and 410 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. A record shall be kept of the results of each inspection.

Record Keeping and Reporting Requirements **[326 IAC 2-6.1-5(a)(2)]** ~~**[326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**~~

D.1.~~6~~**8** Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.

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

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

(~~1~~**A**) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(~~2~~**B**) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(~~c~~**3**) The volume weighted average VOC content of the coatings used for each day;

(~~d~~**4**) The daily cleanup solvent usage; and

(~~e~~**5**) The total VOC usage for each day.

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain semi-annual records of inspections of the cyclones.

****

~~REGISTRATION~~ **MSOP**
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under **326 IAC 2-6.1-5(a)(5).** ~~326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).~~
***

I hereby certify that Forest River Inc., Shasta Division ~~is~~: ☐ still in operation.
☐ no longer in operation.

I hereby certify that Forest River Inc., Shasta Division ~~is~~: ☐ in compliance with the requirements of **MSOP** ~~Registration~~ No. 039-**33752**~~18601~~-00094.
☐ not in compliance with the requirements of **MSOP** ~~Registration~~ No. 039-**33752**~~18601~~-00094.

***

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**

PAGE 1 OF 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:

PAGE 2 OF 2

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 October 4, 2013.

The construction for the new RV assembly areas and operation of this source shall be subject to the conditions of the attached proposed MSOP No. M039-33752-00094. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Julie Alexander 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) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.

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

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

Appendix A: Emission Calculations
Summary

Company Name: **Forest River Inc., Shasta Division**
ddress City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Uncontrolled Potential To Emit of the Entire Source-MSOP

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	3.45	3.84E-01	4.19E-01	-
Woodworking Areas	2.83	2.83	2.83	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01	1,140	0.02	-	1.70E-02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	2.62E-03	2.62E-03	-	-
Total	2.90	2.95	2.95	0.01	0.94	47.10	0.79	1,140	3.47	3.87E-01	4.36E-01	1.98E-05

Uncontrolled Potential To Emit of the Entire Source-PSD and CAM

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	3.45	3.84E-01	4.19E-01	-
Woodworking Areas	56.54	56.54	56.54	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01	1,140	1.78E-02	-	1.70E-02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	2.62E-03	2.62E-03	-	-
Total	56.61	56.66	56.66	0.01	0.94	47.10	0.79	1,140	3.47	3.87E-01	4.36E-01	1.98E-05

Potential To Emit of the Entire Source After Issuance

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	MDI	Hexane	Benzene
RV Assembly Areas	0.05	0.05	0.05	-	-	47.04	-	-	3.45	0.38	0.42	-
Woodworking Areas (MSOP)	2.83	2.83	2.83	-	-	-	-	-	-	-	-	-
Woodworking Areas (PSD and CAM)	*56.54*	*56.54*	*56.54*	-	-	-	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.07	0.07	0.01	0.94	0.05	0.79	1,140	0.02	-	0.02	1.98E-05
Lamination	-	-	-	-	-	2.62E-03	-	-	2.62E-03	2.62E-03	-	-
Total (MSOP)	2.90	2.95	2.95	0.01	0.94	47.10	0.79	1,140	3.47	3.87E-01	4.36E-01	1.98E-05
Total (PSD and CAM)	*56.61*	*56.66*	*56.66*	*0.01*	*0.94*	*47.10*	*0.79*	*1140*	*3.47*	*3.87E-01*	*4.36E-01*	*1.98E-05*

Appendix A: Emission Calculations
Natural Gas Combustion Only

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
2.2	1020	18.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	1.79E-02	7.18E-02	7.18E-02	5.67E-03	9.45E-01	5.20E-02	7.94E-01

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.984E-05	1.134E-05	7.085E-04	1.700E-02	3.212E-05	**1.778E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.724E-06	1.039E-05	1.323E-05	3.590E-06	1.984E-05	**5.177E-05**
					Total HAPs	**1.783E-02**
					Worst HAP	**1.700E-02**

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,134	2.17E-02	2.08E-02
Summed Potential Emissions in tons/yr	1,134		
CO2e Total in tons/yr	1,140		

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
RV Assembly Area VOC

Company Name: Forest River Inc., Shasta Division
Address City IN Zip: 105 County Road 14, Middlebury, Indiana 46540
Permit Number: M039-33752-00094
Reviewer: Julie Alexander
Date: October 10, 2013

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
ALPHA SYSTEMS 1021 LOW VOC ROOFING SEALANT	11.18	7.00E-01	4.500	2.45	7.72	185.33	33.82
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	8.30	1.59E-02	4.500	1.66	0.12	2.85	0.52
ALPHA SYSTEMS 5121, 5152, 5160, 511304P AlphaThane ULTRATATHANE Adhesive/Sealant	11.68	5.00E-03	4.500	0.12	0.00	0.06	0.01
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	9.59	3.00E-02	4.500	3.18	0.43	10.30	1.88
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	8.34	9.16E-02	4.500	0.17	0.07	1.64	0.30
ALPHA SYSTEMS P8010/P8011 WATER BASED EPDM RUBBER ROOFING ADHESIVE	8.35	1.56E-02	4.500	0.02	0.00	0.03	0.01
WD-40	5.9	1.00E-03	4.500	5.30	0.02	0.57	0.10
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	7.70E-03	4.500	0.92	0.03	0.77	0.14
CYCLO INDUSTRIES C33 SILICONE SPRAY	5.34	1.20E-03	4.500	3.35	0.02	0.43	0.08
DAP 12240 DAP Painter's Putty	18.45	1.26E-02	4.500	0.00	0.00	0.00	0.00
DAP 21141, 11008, 21146, 21161, 21181, 99941, 21177 WOOD DOUGH -ALL COLORS	12.30	2.10E-03	4.500	0.10	0.00	0.02	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	6.11	4.80E-03	4.500	5.10	0.11	2.64	0.48
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	10.01	1.87E-02	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	10.01	5.16E-02	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	9.17	2.10E-03	4.500	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	9.17	1.40E-03	4.500	0.00	0.00	0.00	0.00
GEOCEL 2300 CLEAR, 49100, 300102 2300 CLEAR SEALANT	7.76	7.00E-03	4.500	2.91	0.09	2.20	0.40
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	9.92	9.40E-03	4.500	4.62	0.20	4.69	0.86
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	9.85	2.11E-02	4.500	0.39	0.04	0.90	0.16
OATEY 30766, 30779,30782,30795,30805,32216,32217,32218, ABS CLEANER, 32219	6.76	1.00E-03	4.500	6.76	0.03	0.73	0.13
RECTORSEAL 25431, 25631, 75SS16, 22880, 5C RectorSeal No. 5 Soft Set Thread Sealant	11.50	1.60E-03	4.500	1.91	0.01	0.33	0.06
MINERAL SPIRITS	6.30	2.21E-02	4.500	6.30	0.63	15.04	2.74
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	6.08	1.68E-02	4.500	4.26	0.32	7.72	1.41
UNKNOWN IPA ISOPROPYL ALCOHOL	6.50	1.83E-02	4.500	6.50	0.54	12.85	2.34
WESTECH 340003 WES-STICKY CANS AND CANISTER	5.09	2.63E-02	4.500	3.05	0.36	8.66	1.58
			Potential to Emit of all 3 lines (tpy):		**10.74**	**257.77**	**47.04**
			Potential to Emit of of 1 line (tpy):		**3.58**	**85.92**	**15.68**

METHODOLOGY

Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
Potential VOC for 3 lines (lb/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
VOC emission rate per line (lbs/hr) = PTE of all 3 lines (lbs/hr) / 3 lines
Potential VOC for 3 lines (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
VOC emission rate per line (lb/day) = PTE of all 3 lines (lb/day) / 3 lines
Potential VOC for 3 lines (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
VOC emission rate per line (tons/yr) = PTE of all 3 lines (tons/yr) / 3 lines

Appendix A: Emission Calculations
RV Assembly Area PM and HAPs

Company Name: Forest River Inc., Shasta Division
Address City IN Zip: 105 County Road 14, Middlebury, Indiana 46540
Permit Number: M039-33752-00094
Reviewer: Julie Alexander
Date: October 10, 2013

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Particulate Potential (ton/yr)	Transfer Efficiency
WD-40	5.9	90%	1.00E-03	4.500	2.90E-03	75%
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	77%	7.70E-03	4.500	4.96E-02	75%
			Potential to Emit of all 3 lines (tpy):		5.25E-02	
			Potential to Emit of of 1 line (tpy):		1.75E-02	

Note:
Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
Particulate Potential for All 3 lines (ton/yr) = Density(Lb/Gal) x (1- Weight % Volatile (H20 & Organics)) x Gal of Mat. (gal/unit) x Maximum (unit/hour) x (1- transger efficiency (%)) x 8760 hr/yr / 2000 lbs/ton
Particulate Potential for 1 line = PTE for 3 lines (ton/yr)/ 3 lines
All coatings are applied manually using a brushes and rollers with 100% transfer efficiency. These coatings will not emit any particulate matter. WD-40 and Boring Smith Web 76, L7551 Adhesive are applied with a spray can as needed for touch-ups with a 75% transfer efficiency. WD-40 and Boring Smith Web 76, L7551 Adhesive will emit particulate matter.

Material	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % (MDI)	Weight % N-Butyl Phthalate	Weight % N-Hexane	Weight % Perchloroethylene	Weight % Toluene	Weight % Xylene
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	8.30	1.59E-02	4.50	0.00	0.00	3.00E-02	0.00	0.00	0.00	0.00
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	9.59	3.00E-02	4.50	0.00	0.00	0.00	0.00	0.00	0.32	0.00
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	8.34	9.61E-02	4.50	0.00	0.00	0.00	0.00	0.00	2.00E-02	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	10.01	2.44E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	9.85	2.41E-02	4.50	0.00	0.00	0.00	0.00	5.00E-02	0.00	0.00
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	10.01	1.87E-02	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
BORING SMITH WEB 76, L7551 ADHESIVE	5.73	7.70E-03	4.50	0.00	0.00	0.00	0.25	0.00	0.00	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	6.11	4.80E-03	4.50	5.00E-02	0.00	0.00	0.00	0.00	5.00E-02	0.10
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	9.17	2.10E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	9.17	1.40E-03	4.50	0.00	8.00E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	9.92	9.40E-03	4.50	0.00	0.00	0.00	0.00	5.00E-02	0.00	0.00
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	6.08	1.68E-02	4.50	0.00	0.00	0.00	0.10	0.00	0.00	0.00

Material	Ethyl Benzene (ton/yr)	(MDI) (ton/yr)	N-Butyl Phthalate (ton/yr)	N-Hexane (ton/yr)	Perchloroethylene (ton/yr)	Toluene (ton/yr)	Xylene (ton/yr)
ALPHA SYSTEMS 3015 ANTI WICKING WATER BASED ADHESIVE	0.00	0.00	7.80E-02	0.00	0.00	0.00	0.00
ALPHA SYSTEMS P1010 Non Sag Roof Sealant	0.00	0.00	0.00	0.00	0.00	1.81	0.00
ALPHA SYSTEMS P3080 LOW V.O.C. TPO FLOORING ADHESIVE	0.00	0.00	0.00	0.00	0.00	0.32	0.00
FOMO PRODUCTS P10130, 22837 CONSTRUCTION ADHESIVE	0.00	3.86E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL PROFLEX COLORS CARB Compliant Proflex Colors	0.00	0.00	0.00	0.00	0.23	0.00	0.00
FOMO PRODUCTS CONSTRUCTION ADHESIVE One Component Poly Foam Sealant Adhesive	0.00	0.30	0.00	0.00	0.00	0.00	0.00
BORING SMITH WEB 76, L7551 ADHESIVE	0.00	0.00	0.00	0.22	0.00	0.00	0.00
DAP/RUSTOLEUM 55276 Touch N Tone Aerosol Topcoats	2.89E-02	0.00	0.00	0.00	0.00	2.89E-02	5.78E-02
FOMO PRODUCTS P30290, 14236 HANDI-FOAM WHITE FOAM, HANDI-FOAM WHITE FOAM	0.00	3.04E-02	0.00	0.00	0.00	0.00	0.00
FOMO PRODUCTS P30295, 14206 BLACK GUN FOAM	0.00	2.02E-02	0.00	0.00	0.00	0.00	0.00
GEOCEL 2300, 62101, 63100, 66103 HAPS FREE MH/RV	0.00	0.00	0.00	0.00	9.19E-02	0.00	0.00
TACC SP90 STA PUT BIG STICKY CANISTER ADHESIVE	0.00	0.00	0.00	0.20	0.00	0.00	0.00
Potential to Emit of all 3 lines (tpy):	**2.89E-02**	**0.38**	**7.80E-02**	**0.42**	**0.33**	**2.16**	**5.78E-02**
Total HAPs of all 3 lines (tpy):	**3.45**						
Potential to Emit of all 1 lines (tpy):	**0.01**	**0.13**	**0.03**	**0.14**	**0.11**	**0.72**	**0.02**
Total HAPs of all 1 lines (tpy):	**1.15**						

Notes:
Forest River Inc is made up of three (3) buildings. Each building contains one (1) coating line and one (1) woodworking area. The coating lines and woodworking areas are identical.
HAPS emission rate for all 3 lines (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
HAPS emission rate per line (tons/yr) = PTE of all 3 lines (tons/yr) / 3 lines
All other coatings do not contain HAPs.

Appendix A: Emission Calculations
Woodworking

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

Per One (1) Building			
Production Rate units/hr	Number of Units Produced Durning Collection	Sawdast Captured lbs	Amount collected lbs/unit
1.50	120	327	2.73

Per One (1) Building PM/PM10/PM2.5 PTE Before Integral Cyclone				3 Buildings Total
lbs/unit	lbs/hr	lbs/day	tons/year/building	tons/yr
2.87	4.30	103.26	18.85	56.54

Per One (1) Building PM/PM10/PM2.5 PTE After Integral Cyclone				3 Buildings Total
lbs/unit	lbs/hr	lbs/day	tons/year/building	tons/yr
0.14	0.22	5.16	0.94	2.83

Methodology:
Uncontrolled emissions = (Amount collected lb/unit) / (control efficiency)
Controlled emissions = (Uncontrolled emission rate lb/hr) x (1- control efficiency)
The woodworking areas are controlled by a cyclone. Cyclone controll efficiency is 95%.

Allowable Rate of Emissions

Woodworking Area	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Need an Integral Control Device to Exempt from 326 IAC 6-3-2?
Building 53	200	0.10	0.88	Yes
Building 54	200	0.10	0.88	Yes
Building 410	200	0.10	0.88	Yes

Methodology
Each line can process 200 pounds per hour of lumber
Allowable Emissions = 4.10(Process Weight Rate)^0.67

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

Company Name: **Forest River Inc., Shasta Division**
Address City IN Zip: **105 County Road 14, Middlebury, Indiana 46540**
Permit Number: **M039-33752-00094**
Reviewer: **Julie Alexander**
Date: **October 10, 2013**

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

Assume all VOC is MDI

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

4.5 panels per hour * W =	5.990E-04	VOC/HAP pounds/hour
hourly emissions * 8760 hours/year * (1 ton/2000 lbs) =	2.624E-03	VOC/HAP tons/year

Assume all MDI is lost without reaction:

METHODOLOGY
The evaporation rate was determined using an equation developed by the Society of Plastic Industry (see TSD for more detail).
This methodolgy was used to determine the evaporation rate for a similar lamination process located at the Forest River, Inc. Millersburg facility (OAQ Permit #039-26183-00471, issued July 8, 2008).
$W = ((25.4)*(Pt^{o})*(MT)*(\mu^{0.78})*(A))/T$

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

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

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: William G. Conway
Forest River, Inc., Shasta Division
PO Box 3030
Elkhart, IN 46515

DATE: January 27, 2014

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

SUBJECT: Final Decision
Minor Source Operating Permit (MSOP)
039-33752-00094

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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 27, 2014

TO: Middlebury Public Library

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

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

Applicant Name: Forest River, Inc., Shasta Division
Permit Number: 039-33752-00094

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	PWAY 1/27/2014 Forest River Inc., Shasta Division 039-33752-00094 (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 G Conway Forest River Inc., Shasta Division PO Box 3030 Elkhart IN 46515 (Source CAATS)									
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
3		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 *(Local Official)*									
4		Middlebury Public Library 101 East Winslow, P.O. Box 192 Middlebury IN 46540-0192 *(Library)*									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
6		Mr. Bill MacDonald DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 *(Consultant)*									
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