



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: June 20, 2014

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

Source Name: Heartland Recreational Vehicles, LLC – Plant 700

Permit Level: Administrative Amendment

Permit Number: 039-34609-00285

Source Location: 656 North Delaware Street & 345 North Delaware Street, Nappanee, Indiana

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34609.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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.



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Larry York
Heartland Recreational Vehicles, LLC - Plant 700
1001 All Pro Drive
Elkhart, IN 46514

June 20, 2014

Re: 039-34609-00285
Administrative Amendment to
M039-25387-00285

Dear Mr. York:

Heartland Recreational Vehicles, LLC - Plant 700 was issued a Minor Source Operating Permit (MSOP) Renewal No. M039-28387-00285 on April 23, 2008 for a stationary recreational vehicle assembly source located at 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550. On June 04, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to change the name and ownership of the source.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Julie Alexander of my staff at 317-233-1782 or 1-800-451-6027, and ask for extension 3-1782.

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Technical Support Document (TSD)

JA/jla

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



A State that Works



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Commissioner

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Heartland Recreational Vehicles, LLC - Plant 700
656 North Delaware Street and 345 North Delaware St
Nappanee, Indiana 46550**

(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.: M039-25387-00285	
Issued by: <i>Original document signed by</i> Matt Stuckey, Branch Chief Permits Branch Office of Air Quality	Issuance Date: April 23, 2008 Expiration Date: April 23, 2018

Administrative Amendment No.: 039-34609-00285	
Issued by:  Jenny Acker Section Chief, Permits Branch Office of Air Quality	Issuance Date: June 20, 2014 Expiration Date: April 23, 2018

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary recreational vehicle assembly plant.

Source Address:	656 N Delaware St and 345 N Delaware St, Nappanee, Indiana 46550
General Source Phone Number:	(574) 773-5353
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).
 - (1) One Radial Arm Saw.
 - (2) One Table Saw
- (c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device (located at Plant 5).
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

- (d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts (located at Plant 5).
 - (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.
- (e) Ten natural gas fired radiant space heaters (ID's R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19) (located at Plant 5).

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, M039-25387-00285, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M039-25387-00285 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS - Woodworking

Emissions Unit Description:

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).
 - (1) One Radial Arm Saw.
 - (2) One Table Saw
- (c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device (located at Plant 5).
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

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

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

D.1.1 Particulate (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), particulate emissions from the woodworking and cutting equipment, with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5), shall not exceed 1.83 pounds per hour when operating at a process weight of 600 pounds per hour.

Pursuant to 326 IAC 6-3-2, the cyclone dust collector (D1) for PM control shall be in operation at all times when the woodworking equipment of Section D.1(a) is being operated.

- (b) Pursuant to 326 IAC 6-3-2(e), the allowable emissions from the wood cutting equipment connected to a Jet portable dust collector (located at Plant 10) which has a maximum process weight rate of less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-2(e), the Jet portable dust collector shall be in operation at all times the wood cutting equipment (located at Plant 10) is in operation in order to comply with this limit.

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

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.4 Cyclone Inspections

The Permittee shall perform quarterly inspections of the cyclone controlling particulate from the woodworking and cutting equipment to verify that they are being operated and maintained in accordance with the manufacturer's specifications.

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of Stack No. D-1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Failure Detection for the Cyclone

In the event that a cyclone malfunction has been observed:

Failed units and the associated processes will be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency

provisions of this permit (Section B - Emergency Provisions).

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the cyclone stack exhaust daily. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of any failed or broken units of the cyclone.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Assembly Lines

Emissions Unit Description:

- (d) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts (located at Plant 5).
- (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2) the allowable particulate rate from the assembly line operation which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total VOC content of materials applied by the various methods in this section to the various assembly parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.2.3 Preventative Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.
- (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent used less water on a monthly basis:
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month;
 - (4) The total individual and combined HAP usage for each month;
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition..

D.2.5 Reporting Requirements

An annual summary of the monthly VOC usage to document the compliance status with Condition D.2.2 shall be submitted by April 15 of each year. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition.

The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**MINOR SOURCE OPERATING PERMIT
Annual Notification**

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

Company Name:	Heartland Recreational Vehicles, LLC - Plant 700
Address:	656 N Delaware St and 345 N Delaware St
City:	Nappanee, Indiana 46550
Phone #:	(574) 773-5353
MSOP #:	M039-25387-00285

I hereby certify that Heartland Recreational Vehicles, LLC Plant 700 is : still in operation.

no longer in operation.

I hereby certify that Heartland Recreational Vehicles, LLC Plant 700 is : in compliance with the requirements of MSC M039-25387-00285.

not in compliance with the requirements of MSOP M039-25387-00285.

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

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

Noncompliance:

Malfunction Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Description and Location

Source Name: Heartland Recreational Vehicles, LLC - Plant 700
Source Location: 656 N Delaware St and 345 N Delaware St, Nappanee, IN
46550
County: Elkhart County
SIC Code: 3792
Operation Permit No.: M039-28387-00285
Operation Permit Issuance Date: April 23, 2008
Administrative Amendment No.: 039-34609-00285
Permit Reviewer: Julie Alexander

On June 04, 2014, the Office of Air Quality (OAQ) received an application from Heartland Recreational Vehicles, LLC - Plant 700 related to an amendment to an existing stationary recreational vehicle assembly source.

Source Definition

Pursuant to Notice-Only Change No. 039-18558-00285, issued on April 30, 2004, this recreational vehicle assembly company consists of two (2) plants:

- (a) Plant 5 is located at 656 North Delaware Street, Nappanee, Indiana.
- (b) Plant 10 is located at 345 North Delaware Street, Nappanee, Indiana.

Pursuant to Notice-Only Change No. 039-18558-00285, issued on April 30, 2004, because the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Existing Approvals

The source was issued MSOP Renewal No. 039-25387-00285 on June 4, 2014. There have been no subsequent approvals issued.

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	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

Pollutant	Designation
	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.

- (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}. Therefore, direct PM_{2.5}, SO₂, and NO_x 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 all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

This PTE table is from the TSD or Appendix A of M039-28387-00285, issued on April 23, 2008.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Amendment (tons/year)*							
	PM	PM10	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating	2.95	2.95	-	-	45.41	-	9.51	4.67
Woodworking Operation	37.93	37.93	-	-	-	-	-	-
Nat. Gas Combustion	0.01	0.03	-	0.55	0.03	0.46	-	-
Total PTE of Entire Source	40.89	40.91	0.00	0.55	45.44	0.46	9.52	4.68
Title V Major Source Thresholds**	NA	100	100	100	100	100	25	10

negl. = negligible
 *These emissions are based upon M039-28387-00285 issued on April 23, 2008
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Heartland Recreational Vehicles, LLC - Plant 700 on June 4, 2014, relating to the change in name of the facility and change in ownership. The calculations were also updated to include PM_{2.5} and GHGs emission calculations. There is no change to the Federal or State rule applicability based on the updated calculations.

Enforcement Issues

There are no pending enforcement actions related to this amendment.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Amendment

- (a) Pursuant to 326 IAC 2-6.1-6(d)(2)(A), this change to the permit is considered an administrative amendment because the permit is amended to change the name, address or telephone number of any person identified in the permit.
- (b) Pursuant to 326 IAC 2-6.1-6(d)(3), this change to the permit is considered an administrative amendment because the permit is amended to indicate a change in ownership or operational control of the source.

PTE of the Entire Source After Issuance of the MSOP Amendment

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Surface Coating	2.95	2.95	2.95	-	-	45.41	-	-	9.51	4.67
Woodworking Operation	37.93	37.93	37.93	-	-	-	-	-	-	-
Nat. Gas Combustion	0.01	0.03	0.04	- 3.29E-03	0.55	0.03	0.46	661	-	-
Total PTE of Entire Source	40.89	40.942	40.92	0.00 3.29E-03	0.55	45.44	0.46	661	9.52	4.68 4.67
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Surface Coating	2.95	2.95	2.95	-	-	45.41	-	-	9.51	4.67
Woodworking Operation	37.93	37.93	37.93	-	-	-	-	-	-	-
Nat. Gas Combustion	0.01	0.03	0.04	3.29E-03	0.55	0.03	0.46	661	-	-
Total PTE of Entire Source	40.89	40.942	40.92	3.29E-03	0.55	45.44	0.46	661	9.52	4.67
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

MSOP Status

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

year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

- (c) This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed amendment.

Compliance Assurance Monitoring (CAM)

- (c) 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

Since this action proposes no changes to the equipment at the facility, there is no change in State Rule Applicability for this source due to this amendment.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M039-28387-00285 issued on April 23, 2008.

Proposed Changes

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

Summary of IDEM Updates Throughout the Permit

- (a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (b) Effective May 11, 2010 all Indiana Counties were designated as attainment for the 8-hour ozone standard
- (c) **Multiple Conditions - Timeframe References**
IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than".

- (d) **Multiple Conditions - Certification Requirement References**
IDEM, OAQ has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
- (e) **Multiple Conditions - Branch Name Updates**
Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
- (f) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.
- (g) **Section B - Permit Renewal**
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (h) **Section B - Termination of Right to Operate**
IDEM, OAQ has revised Section B - Termination of Right to Operate to more closely reflect the underlying rule.
- (i) **Section C - Opacity**
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (j) **Section C - Incineration**
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- (k) **Section C - Asbestos Abatement Projects**
IDEM, OAQ has revised paragraph (g) of Section C - Asbestos Abatement Projects to match the rule language in 326 IAC 14-10-1(a).
- (l) **Section C - Performance Testing**
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (m) **Section C - Monitoring Methods**
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (n) **Section C - Instrument Specifications**
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

- (o) **Section C - Response to Excursions or Exceedances**
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (p) **Section C - Actions Related to Noncompliance Demonstrated by a Stack Test**
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (q) **Section C - General Record Keeping Requirements**
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

Section A - Amendments

- (a) The source address has been updated to include both plants.
- (b) Section A has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit".

Section A has been amended as follows:

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

The Permittee owns and operates a stationary recreational vehicle assembly plant.

Source Address: 656 N Delaware ~~St~~ and 345 N Delaware St, Nappanee, Indiana 46550

Mailing Address: ~~656 North Delaware Street, Nappanee, IN 46550~~

Source Location Status: Attainment for ~~8-hour ozone standard~~
Attainment for all other criteria pollutants

Section B and Section C - Amendments

Section B and Section C has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit".

Section B and Section C has been amended as follows:

SECTION B GENERAL CONDITIONS

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

~~B.8 Certification~~

- ~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- ~~(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~
- ~~(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

~~B.9B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

~~***~~

~~B.109 Preventive Maintenance Plan [326 IAC 1-6-3]~~

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

The Permittee shall implement the PMPs.

- (ab) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain and implement**

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:

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions ~~or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

(ed) ***

B.4110 Prior Permits Superseded [326 IAC 2-1.1-9.5]

B.4211 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ~~ninety (90)~~ **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.4312 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 certification 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
~~Permits Branch~~
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 ~~ninety (90)~~ **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.4413 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Any such application shall be certified by an "authorized individual" as defined by ~~326 IAC 2-1.1-1(1)~~.
- (c) The Permittee shall notify the OAQ ~~with~~ **no later than** thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.4514 Source Modification Requirement

B.4615 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

B.4716 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) ***
- (b) ***

Indiana Department of Environmental Management
~~Permits Branch~~
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 ~~the certification 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) ***

B.4817 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to ~~IDEM, OAQ~~ **due no later than thirty (30) calendar days of receipt of a billing—bill from IDEM, OAQ,.**

(b) ***

B.4918 Credible Evidence [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS

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:

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

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and 326 IAC 9-1-2-2~~ **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.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(d) ***

All required notifications shall be submitted to:

Indiana Department of Environmental Management
~~Asbestos Section~~
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-~~52-53~~ 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. ~~The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

(g) Indiana Accredited **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 Accredited **Licensed** Asbestos

Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana ~~Accredited~~**Licensed** Asbestos inspector is not federally enforceable.

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

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

(a) 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 ~~Data Section~~ **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. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~(c) ***~~

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

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

~~**C.13 C.12 Instrument Specifications [326 IAC 2-1.1-11]**~~

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

~~**C.14 C.13 Response to Excursions or Exceedances**~~

~~(a) Upon detecting an excursion ~~or 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 ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).~~ **Corrective actions. The response** may include, but ~~are~~ **is** not limited to, the following:
- (1) ***
 - (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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~ **normal or usual manner of operation.**

- (e) The Permittee shall ~~maintain record~~ the following records:
- (1) ~~monitoring data;~~
 - (2) ~~monitor performance data, if applicable; and~~
 - (3) ~~corrective actions~~ **reasonable response steps** taken.

C.1514 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of these its response actions to IDEM, OAQ, within thirty (30) no later than seventy-five (75) days of receipt after the date of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- (b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred ~~twenty (120) eighty (180) days of receipt after the original date of the test results.~~ Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120) eighty (180) days~~ is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) ***

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

C.16C.15 Malfunctions Report [326 IAC 1-6-2]

C.17C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) ***

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee** shall be ~~implemented within~~ **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.18C.17~~ General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance ~~Data Section~~ 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) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(d)(c)~~ ***

Section D.1 - Amendments

- (a) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
- (b) IDEM, OAQ has revised the language in the Cyclone Inspections, Failure Detection for the Cyclone, and Record Keeping Requirements conditions to clarify the Permittee's responsibility.

Section D.1 has been amended as follows:

D.1.2 Preventative Maintenance Plan [326 IAC 2-4-4(9)]

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

D.1.4 Cyclone Inspections

The Permittee shall perform quarterly inspections ~~An inspection shall be performed each calendar quarter of the cyclone controlling particulate from the woodworking and cutting equipment to verify that they are being operated and maintained in accordance with the manufacturer's specifications.~~ ~~with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).~~

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of Stack No. D-1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. ~~steps in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.1.6 ~~Broken or~~ Failure Detection for the Cyclone

In the event that a cyclone **malfunction** ~~failure~~ has been observed:

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

D.1.7 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the cyclone stack exhaust daily. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (b) To document **the compliance status** with Condition D.1.6, the Permittee shall maintain records of any failed or broken units of the cyclone.
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **contains the Permittee's obligation with regard to the records required by this condition.**

Section D.2 - Amendments

- (a) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
- (b) IDEM, OAQ has revised the language in the Record Keeping Requirements and Reporting Requirements conditions to clarify the Permittee's responsibility.

Section D.2 has been amended as follows:

D.2.3 Preventative Maintenance Plan [326 IAC ~~1-6-3 2-4-4(9)~~]

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

D.2.4 Record Keeping Requirements

- (a) To document **the** compliance **status** with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

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

D.2.5 Reporting Requirements

An annual summary of the monthly VOC usage to document **the** compliance **status** with Condition D.2.2 shall be submitted by April 15 of each year. ~~to the address listed in Section C - General Reporting Requirements~~ **contains the Permittee's obligation with regard to the reporting required by this condition.**, of this permit, using the reporting forms located at the end of this permit, or their equivalent.

The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 June 4, 2014.

This proposed amendment shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No. 039-34609-00285. The staff recommends to the Commissioner that this MSOP Administrative Amendment 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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Heartland Recreational Vehicles, LLC - Plant 700
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550
Permit No.: 039-34609-00285
Reviewer: Julie Alexander
Date: June 13, 2014

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	CO ₂ e	Total HAPs
Surface Coating Operations	2.95	2.95	2.95	-	-	45.41	-	-	9.51
Natural Gas Combustion	0.01	0.04	0.04	3.29E-03	0.55	0.03	0.46	661	0.01
Sub-Total (Excludes Emission Units with Integral Devices)	2.96	3.00	3.00	3.29E-03	0.55	45.44	0.46	661	9.52
Emission Units with Integral Devices									
Wood and Non-Wood Cutting Operations	37.93	37.93	37.93	-	-	-	-	-	-
Total	40.89	40.92	40.92	3.29E-03	0.55	45.44	0.46	661	9.52

* PM2.5 listed is direct PM2.5

Note: PM, PM10, PM2.5 emissions from the wood operations were calculated after consideration of the controls based on the integral to the process determination.

Uncontrolled Potential to Emit (tons/yr) - PSD and CAM Determinations									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	CO ₂ e	Total HAPs
Sub-Total (Excludes Emission Units with Integral Devices)	2.96	3.00	3.00	3.29E-03	0.55	45.44	0.46	661	9.52
Emission Units with Integral Devices									
Wood and Non-Wood Cutting Operations	7.00	7.00	7.00	-	-	-	-	-	-
Total	9.96	10.00	10.00	3.29E-03	0.55	45.44	0.46	661	9.52

* PM2.5 listed is direct PM2.5

Note: Controls that are integral to the process are not considered for purposes of PSD or CAM

Controlled Potential to Emit after Issuance (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	CO ₂	Total HAPs
Surface Coating Operations	2.95	2.95	2.95	-	-	45.41	-	-	9.51
Wood and Non-Wood Cutting Operations	7.00	7.00	7.00	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.04	0.04	3.29E-03	0.55	0.03	0.46	661	0.01
Total	9.96	10.00	10.00	3.29E-03	0.55	45.44	0.46	661	9.52

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	CO ₂	Total HAPs
Surface Coating Operations	2.95	2.95	2.95	-	-	45.41	-	-	9.51
Natural Gas Combustion	0.01	0.04	0.04	3.29E-03	0.55	0.03	0.46	661	0.01
Total	2.96	3.00	3.00	3.29E-03	0.55	45.44	0.46	661	9.52
Emission Units with Integral Devices									
Wood and Non-Wood Cutting Operations	37.93	37.93	37.93	-	-	-	-	-	-
Total	40.89	40.92	40.92	3.29E-03	0.55	45.44	0.46	661	9.52

* PM2.5 listed is direct PM2.5

Note: PM, PM10, PM2.5 emissions from the wood operations were calculated after consideration of the controls based on the integral to the process determination.

Potential to Emit after Issuance (tons/yr) - PSD and CAM									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	CO ₂ e	Total HAPs
Sub-Total (Excludes Emission Units with Integral Devices)	2.96	3.00	3.00	0.00	0.55	45.44	0.46	661	9.52
Emission Units with Integral Devices									
Wood and Non-Wood Cutting Operations	7.00	7.00	7.00	-	-	-	-	-	-
Total	9.96	10.00	10.00	0.00	0.55	45.44	0.46	661	9.52

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: Controls that are integral to the process are not considered for purposes of PSD or CAM

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Heartland Recreational Vehicles, LLC - Plant 700
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550
Permit No.: 039-34609-00285
Reviewer: Julie Alexander
Date: June 13, 2014

Uncontrolled Potential to Emit (tons/yr)															
Emission Unit	Xylene	Toluene	Perchloroethylene	Ethyl Benzene	Hexane	MDI	Benzene	Dichlorobenzene	Formaldehyde	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Surface Coating Operations	1.85E-02	0.19	4.67	3.97E-03	4.63	2.65E-03	-	-	-	-	-	-	-	-	9.51
Natural Gas Combustion	-	1.86E-05	-	-	9.86E-03	-	1.15E-05	6.57E-06	4.11E-04	2.74E-06	6.02E-06	7.67E-06	2.08E-06	1.15E-05	1.03E-02
Total	1.85E-02	1.89E-01	4.67	3.97E-03	4.64	2.65E-03	1.15E-05	6.57E-06	4.11E-04	2.74E-06	6.02E-06	7.67E-06	2.08E-06	1.15E-05	9.52

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)															
Emission Unit	Xylene	Toluene	Perchloroethylene	Ethyl Benzene	Hexane	MDI	Benzene	Dichlorobenzene	Formaldehyde	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Surface Coating Operations	1.85E-02	0.19	4.67	3.97E-03	4.63	2.65E-03	-	-	-	-	-	-	-	-	9.51
Natural Gas Combustion	-	1.86E-05	-	-	9.86E-03	-	1.15E-05	6.57E-06	4.11E-04	2.74E-06	6.02E-06	7.67E-06	2.08E-06	1.15E-05	1.03E-02
Total	1.85E-02	1.89E-01	4.67	3.97E-03	4.64	2.65E-03	1.15E-05	6.57E-06	4.11E-04	2.74E-06	6.02E-06	7.67E-06	2.08E-06	1.15E-05	9.52

* PM2.5 listed is direct PM2.5

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Heartland Recreational Vehicles, LLC - Plant 700
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550
Permit Number: 039-34609-00285
Permit Reviewer: Julie Alexander
Date: June 13, 2014

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene / Diethylene Glyco	Weight % Perchloroethylene	Weight % Ethyl Benzene	Weight % Hexane	Weight % Methylene Bis Iso (MDI)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	MDI Emissions (ton/yr)
Geocel 2300	8.41	0.470000	1.50	0.00%	0.00%	17.98%	0.00%	0.00%	0.00%	0.00	0.00	4.67	0.00	0.00	0.00
AH Sealer	8.60	0.013000	1.50	0.00%	1.95%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00
Bostic Supertac	5.75	0.350000	1.50	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.00	0.00	0.00	4.63	0.00
Brake Cleaner	6.33	0.020000	1.50	0.00%	21.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.17	0.00	0.00	0.00	0.00
BosticCaulk90	10.1	0.004000	1.50	7.00%	0.00%	0.00%	1.50%	0.00%	1.00%	0.02	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

0.02 0.19 4.67 0.00 4.63 0.00

METHODOLOGY

Total HAPs = 9.51

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

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

Ten space heaters rated 0.125 MMBtu per hour each

Company Name: Heartland Recreational Vehicles, LLC - Plant 70C
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 4655C
Permit Number: 039-34609-00285
Reviewer: Julie Alexander
Date: June 13, 2014

Heat Input Capacity
MMBtu/hr

1.25

Potential Throughput
MMCF/yr

11.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
					**see below		
Potential Emission in tons/yr	0.01	0.04	0.04	0.00	0.55	0.03	0.46

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.150E-05	6.570E-06	4.106E-04	9.855E-03	1.862E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.738E-06	6.023E-06	7.665E-06	2.081E-06	1.150E-05

Total HAPs: 0.01

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	657	0	0
Summed Potential Emissions in tons/yr	657		
CO2e Total in tons/yr	661		

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 1-03-006-0: (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

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

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64

Emission

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 (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations (PM and PM-10)
from Wood and Non-Wood Cutting Operations**

Company Name: Heartland Recreational Vehicles, LLC - Plant 700
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550
Permit Number: 039-34609-00285
Reviewer: Julie Alexander
Date: June 13, 2014

Facility Descriptions:

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1) (located at Plant 5).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.

- (b) Wood cutting equipment connected to a Jet portable dust collector. The dust collector operates at 650 acfm, with a maximum grain loading of 0.02 gr/dscf (located at Plant 10).
 - (1) One Radial Arm Saw.
 - (2) One Table Saw

- (c) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

Potential Emissions:

- (a) For wood cutting operations that are attached to a control device.

The following calculations determine the PM emissions from the wood cutting operations attached to dust collector D-1.

Uncontrolled emissions = (amount collected lb/hr) / (control efficiency) * (8760 hours/year) * (1 ton/2000 lbs)

Uncontrolled emissions = (9 lbs/hr) / (85% control efficiency) = **10.59 lbs/hr**

(10.59 lbs/hr) * (8760 hrs/year) * (1 ton/2000 lbs) = **33.507 tons/yr**

Controlled emissions = (Uncontrolled emission rate lb/hr) * (1-control efficiency) * (8760 hrs/year) * (1 ton/2000 lbs)

Controlled emissions = (10.59 lbs/hr) * (1-0.85) = **1.59 lbs/hr**

(1.59 lbs/hr) * (8760 hrs/year) * (1 ton/2000 lbs) = **6.96 tons/year**

**Appendix A: Emissions Calculations (PM and PM-10)
from Wood and Non-Wood Cutting Operations**

Company Name: Heartland Recreational Vehicles, LLC - Plant 700
Address City IN Zip: 656 N Delaware St and 345 N Delaware St, Nappanee, IN 46550
Permit Number: 039-34609-00285
Reviewer: Julie Alexander
Date: June 13, 2014

(b) For wood cutting operations that are attached to a control device.

The following calculations determine the PM emissions from the wood cutting operations attached to a Jet portable dust collector based on the amount of dust collected:

Uncontrolled emissions = (amount collected lb/hr) / (control efficiency) * (8760 hours/year) * (1 ton/2000 lbs)
Uncontrolled emissions = (1 lb/hr) / (99% control efficiency) = **1.01 lb/hr**
 (1.01 lb/hr) * (8760 hours/year) * (1 ton/2000 lbs) = **4.42 tons/year**

Controlled emissions = (Uncontrolled emission rate lb/hr) * (1-control efficiency) * (8760 hrs/year) * (1 ton/2000 lbs)
Controlled emissions = (1.01 lb/hr) * (1-control efficiency) = **0.01 lb/hr**
 (0.01 lb/hr) * (8760 hours/year) * (1 ton/2000 lbs) = **0.04 tons/year**

(c) For trimming operations, other than wood cutting, the potential emissions are negligible since the type of dust created is not "airborne"

Total PM/PM10/PM2.5 Potential Emissions for wood cutting operations =

Uncontrolled Emissions = 33.507 + 4.42 =	37.93 tons per year
Controlled Emissions = 6.96 + 0.04 =	7.00 tons per year



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

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

TO: Larry York
Heartland Recreational Vehicles, LLC – Plant 700
1001 All Pro Drive
Elkhart, In 46514

DATE: June 20, 2014

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

SUBJECT: Final Decision
Administrative Amendment
039-34609-00285

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:
Doug Elliott – D & B Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 6/20/2014 Heartland Recreational Vehicle 039-34609-00285 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Larry York Heartland Recreational Vehicle 1001 All Pro Drive Elkhart IN 46514 (Source CAATS) via confirmed delivery										
2		Nappanee City Council and Mayors Office P.O. Box 29 Nappanee IN 46550 (Local Official)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
6		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
5			