



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: February 20, 2015

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

Source Name: Highland Ridge RV, Inc.

Permit Level: New Source Construction and
Minor Source Operating Permit (MSOP)

Permit Number: 087-34865-00679

Source Location: 3195 North State Road 5
Shipshewana, Indiana

Type of Action Taken: Initial Permit

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

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 34865.

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

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

(continues on next page)

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

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

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

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

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



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

**Highland Ridge RV, Inc.
3195 North State Road 5
Shipshewana, Indiana 46565**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

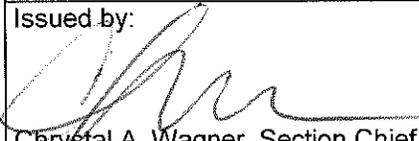
Operation Permit No.: M087-34865-00679	
Issued by:  Crystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 20, 2015 Expiration Date: February 20, 2020

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- D.2.1 Best Available Control Technology (BACT) Minor Limit - VOC [326 IAC 8-1-6]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.3 Volatile Organic Compounds

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

- D.2.4 Record Keeping Requirement
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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.3 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 travel trailer assembly plant.

Source Address:	3195 North State Road 5, Shipshewana, Indiana 46565
General Source Phone Number:	(260) 768-7771
SIC Code:	3792
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 1-2-73]

This source consists of the following plants:

- (a) Plant 1 is located at 3195 North State Road 5, Shipshewana, Indiana, Plant ID: 087-00679; and
- (b) Plant 2 is located at 925 North State Road 5, Shipshewana, Indiana, Plant ID: 087-00679.

These plants are located on adjacent properties, have the same SIC code of 3792, and are under common control; therefore, they will be considered one (1) source, as defined by 326 IAC 2-7-1(22), effective from the date of issuance of this MSOP.

A.3 Emission Units and Pollution Control Equipment Summary

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

Plant 1

- (a) One (1) fabrication facility, identified as P1 Fab, approved in 2014 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
 - (1) One (1) lamination operation, identified as P1 Lamination, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of flow coating and hand application of coatings.
 - (2) One (1) final finish operation, identified as P1 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (3) One (1) assembly operation, identified as P1 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.

- (b) One (1) woodworking operation, identified as WW-1, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:
 - (1) Five (5) chop saws, identified as 1CS4 through 1CS8;
 - (2) One (1) band saw, identified as 1BS1; and
 - (3) Six (6) hand routers, identified as 1HR1 through 1HR6.
- (c) One (1) material cutting operation, identified as MC1, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:
 - (1) Two (2) aluminum chop saws, identified as 1CS2 and 1CS3; and
 - (2) One (1) PVC chop saw, identified as 1CS1.
- (d) One (1) welding operation, approved in 2015 for construction, using less than six hundred twenty-five (625) pounds of weld wire per day, utilizing no control, exhausting within the building, and consisting of:
 - (1) Seven (7) metal inert gas (MIG) welding stations, identified as MIG1-MIG8, nominally rated for a maximum capacity of 4.5 pounds electrode per hour, each.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
 - (1) Six (6) natural gas-fired space heaters, identified as H1-H6, each rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

Plant 2

- (a) One (1) fabrication facility, identified as P2 Fab, approved in 2015 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
 - (1) One (1) final finish operation, identified as P2 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as P2 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
 - (1) Three (3) natural gas-fired radiant tube heaters, identified as H8-H11, each rated at 0.120 million British thermal units per hour (MMBtu/hr);
 - (2) Two (2) natural gas-fired radiant tube heaters, identified as H12 and H13, each rated at 0.080 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired space heater, identified as H7, rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (c) One (1) woodworking operation, identified as WW-2, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:

- (1) Six (6) chop saws, identified as 2CS1 through 2CS6;
 - (2) One (1) band saw, identified as 2BS1;
 - (3) Two (2) table saws, identified as 2TS1 and 2TS2; and
 - (4) One (1) radial arm saw, identified as 2RS1.
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M087-34865-00679, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M087-34865-00679 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

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

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

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

B.16 Source Modification Requirement

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

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

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

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

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

- (a) One (1) fabrication facility, identified as P1 Fab, approved in 2015 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
- (1) One (1) lamination operation, identified as P1 Lamination, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of flow coating and hand application of coatings.
 - (2) One (1) final finish operation, identified as P1 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (3) One (1) assembly operation, identified as P1 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.

(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 Best Available Control Technology (BACT) Minor Limit - VOC [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the fabrication facility P1 Fab shall be limited as follows:

- (1) The total VOC input to P1 Fab, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from P1 Fab and shall render the requirements of 326 IAC 8-1-6 not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for P1 Fab. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds

Compliance with the VOC usage limitations for P1 Fab shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.4 Record Keeping Requirement

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) Total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 2

- (a) One (1) fabrication facility, identified as P2 Fab, approved in 2015 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following:
- (1) One (1) final finish operation, identified as P2 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as P2 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.

(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 Best Available Control Technology (BACT) Minor Limit - VOC [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the fabrication facility P2 Fab shall be limited as follows:

- (1) The total VOC input to P2 Fab, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from P2 Fab and shall render the requirements of 326 IAC 8-1-6 not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for P2 Fab. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Volatile Organic Compounds

Compliance with the VOC usage limitations for P2 Fab shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC

usage limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee 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 and Enforcement Branch

Quarterly Report

Source Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, Indiana 46565
MSOP Permit No.: M087-34865-00679
Source: P1 Fab
Pollutant: VOC
Limit: The total VOC input to P1 Fab shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch**

Quarterly Report

Source Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, Indiana 46565
MSOP Permit No.: M087-34865-00679
Source: P2 Fab
Pollutant: VOC
Limit: The total VOC input to P2 Fab shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Highland Ridge RV, Inc.
Address:	3195 North State Road 5
City:	Shipshewana, Indiana 46565
Phone #:	(260) 768-7771
MSOP #:	M087-34865-00679

I hereby certify that Highland Ridge RV, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Highland Ridge RV, Inc. is :

in compliance with the requirements of MSOP M087-34865-00679.

not in compliance with the requirements of MSOP M087-34865-00679.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Highland Ridge RV, Inc.
3195 North State Road 5
Shipshewana, Indiana 46565

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Highland Ridge RV, Inc., 3195 North State Road 5, Shipshewana, Indiana 46565, has constructed and will operate a recreational travel trailer assembly plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 26, 2014 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M087-34865-00679, Plant ID No. 087-00679 issued on _____.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	Highland Ridge RV, Inc.
Source Location:	3195 North State Road 5, Shipshewana, Indiana 46565
County:	LaGrange
SIC Code:	3792
Operation Permit No.:	M087-34865-00679
Permit Reviewer:	Donald McQuigg

On August 26, 2014, the Office of Air Quality (OAQ) received an application from Highland Ridge RV, Inc. related to the construction and operation of a new stationary recreational travel trailer assembly plant.

Source Definition

Highland Ridge RV, LLC operates two travel trailer manufacturing operations at separate locations in Shipshewana, Plant 1 at 3195 North S.R. 5 and Plant 2 at 0925 North S.R. 5. IDEM, OAQ has examined whether these plants are part of the same source. The term "source" is defined at 326 IAC 1-2-73. In order for these plants to be considered one source they must meet all three of the following criteria:

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

Highland Ridge RV, LLC owns both of the plants. Since Highland Ridge RV, LLC is the common owner, common control also exists. The first part of the source definition is met for the two plants.

The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. The principal product of both plants is travel trailers. Both plants have the two-digit SIC Code 37, for the Major Group Transportation Equipment.

A plant is considered a support facility if at least 50% of its output is dedicated to another plant. Plant 1 does send laminated parts to Plant 2, but this is less than 50% of Plant 1's total output. Plant 2 does not send any output to Plant 1. Therefore, neither plant qualifies as a support facility. Since the two plants have the same two-digit SIC Code, they meet the second part of the source definition.

The last criterion of the source definition is whether the plants are on the same, contiguous or adjacent properties. Plant 1 and 2 are located approximately 2 miles apart. They are, therefore, not located on the same or contiguous properties.

Since the plants are not located on the same or contiguous properties, IDEM, OAQ has evaluated whether they are on adjacent properties. All evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?

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

Plant 1 is located on property that is approximately two miles from Plant 2. Materials are routinely transferred between the plants with laminated parts made in Plant 1 being shipped to Plant 2 for assembly into travel trailers. No production employees frequently shuttle back and forth to be involved in both plants, but the plants share common office, managerial and support employees with managers frequently traveling between the two plants. There is a split production between the two facilities, with Plant 1 doing all the lamination work for Plant 2. Considering all these factors, IDEM, OAQ finds that the plants are located on adjacent properties. Therefore, the third part of the source definition is met.

IDEM, OAQ, finds that the two plants meet all three parts of the source definition and are part of the same source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective 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.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. LaGrange 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}**
 LaGrange 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**
 LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

- (b) Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Highland Ridge RV, Inc. on August 26, 2014, relating to the construction and operation of new emission units.

The following is a list of the new emission units:

Plant 1

- (a) One (1) fabrication facility, identified as P1 Fab, approved in 2015 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
- (1) One (1) lamination operation, identified as P1 Lamination, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of flow coating and hand application of coatings.
 - (2) One (1) final finish operation, identified as P1 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (3) One (1) assembly operation, identified as P1 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (b) One (1) woodworking operation, identified as WW-1, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:
- (1) Five (5) chop saws, identified as 1CS4 through 1CS8;
 - (2) One (1) band saw, identified as 1BS1; and
 - (3) Six (6) hand routers, identified as 1HR1 through 1HR6.
- (c) One (1) material cutting operation, identified as MC1, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:
- (1) Two (2) aluminum chop saws, identified as 1CS2 and 1CS3; and
 - (2) One (1) PVC chop saw, identified as 1CS1.
- (d) One (1) welding operation, approved in 2014 for construction, using less than six hundred twenty-five (625) pounds of weld wire per day, utilizing no control, exhausting within the building, and consisting of:
- (1) Seven (7) metal inert gas (MIG) welding stations, identified as MIG1-MIG8, nominally rated for a maximum capacity of 4.5 pounds electrode per hour, each.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
- (1) Six (6) natural gas-fired space heaters, identified as H1-H6, each rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

Plant 2

- (a) One (1) fabrication facility, identified as P2 Fab, approved in 2015 for construction, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
- (1) One (1) final finish operation, identified as P2 Final Finish, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as P2 Assembly, approved in 2015 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
- (1) Three (3) natural gas-fired radiant tube heaters, identified as H8-H11, each rated at 0.120 million British thermal units per hour (MMBtu/hr);
 - (2) Two (2) natural gas-fired radiant tube heaters, identified as H12 and H13, each rated at 0.080 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired space heater, identified as H7, rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (c) One (1) woodworking operation, identified as WW-2, approved in 2015 for construction, with no particulate controls, exhausting within the building, and consisting of:
- (1) Six (6) chop saws, identified as 2CS1 through 2CS6;
 - (2) One (1) band saw, identified as 2BS1;
 - (3) Two (2) table saws, identified as 2TS1 and 2TS2; and
 - (4) One (1) radial arm saw, identified as 2RS1.
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

“Integral Part of the Process” Determination

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

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Pure MDI is a solid at room temperature and has an extremely low vapor pressure (1.0×10^{-5} mm Hg @ 298.2 K). MDI is also a highly reactive chemical which readily undergoes a chemical reaction to form a non volatile polyurethane polymer. Therefore, when adequate information is available, the potential VOC/HAP emissions are

estimated by engineering calculations utilizing physical and chemical properties and fundamental relationships, such as, Raoult's law, Henry's law, and the ideal gas law.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	2.60
PM ₁₀ ⁽¹⁾	2.40
PM _{2.5} ⁽¹⁾	2.40
SO ₂	0.009
NO _x	1.437
VOC	53.166
CO	1.207

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

HAPs	Potential To Emit (tons/year)
Hexane	1.07
Xylene	0.51
Tetrachloroethylene	1.53
MDI	6.23
Methylene chloride	1.77
Manganese	0.44
TOTAL HAPs	11.55

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source is not located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, is not a major source, is not located at a major source, and is not part of a major source of emissions of hazardous air pollutants (HAP).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit because the source is not a major source of HAPs as defined in 40 CFR 63.2.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP are not included in the permit since this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (f) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH), because this source does not meet the definition of spray application of coatings to motor vehicles and mobile equipment. Pursuant to 40 CFR 63.11170(a)(2), this source does perform application of coatings to motor vehicles and mobile equipment. Pursuant to 40 CFR 63.11180, *mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels). However, pursuant to the definition of *spray application of coatings*, in 40 CFR 63.11180, spray-applied coatings do not include surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens. Since this source uses only hand application of coatings, flow coating, and hand-held aerosol containers, this source does not meet the applicability criteria as specified in 40 CFR 63.11169(b).

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

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in the permit, since the source is not primarily engaged in operations which are classified in one (1) of the nine (9) source categories listed in this NESHAP.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

- (g) 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

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This new source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit all PSD regulated pollutants, excluding GHGs, are less than two hundred fifty (250) tons per year;
- (2) This source is not one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

Fabrication Facility P1 Fab

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b), P1 Fab is exempt from the requirements of 326 IAC 6-3-2 because the surface coating activities of this facility utilize only brush, hand-held aerosol canisters and flow coating application techniques.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

P1 Fab is not subject to 326 IAC 20-48, 326 IAC 20-56, or any other rule under Article 8 and its unlimited VOC potential emissions are greater than twenty-five (25) tons per year. However, the source has elected to limit the VOC potential emissions from P1 Fab to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the fabrication facility P1 Fab shall be limited as follows:

- (1) The total VOC input to P1 Fab, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with this limit shall limit the potential to emit VOC from P1 Fab to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The fabrication facility P1 Fab, constructed after 1990, is not subject to 326 IAC 8-2-9 because the PTE VOC is less than fifteen (15) lb/day when coating metal. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)

P1 Fab is considered an industrial adhesive application process. P1 Fab has actual VOC emissions of greater than three (3) tons per twelve (12) month period before add-on controls; however, this facility is not located in Lake or Porter County. Therefore, the requirements of 326 IAC 8-22 do not apply.

Fabrication Facility P2 Fab

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b), P2 Fab is exempt from the requirements of 326 IAC 6-3-2 because the surface coating activities of this facility utilize only brush, hand-held aerosol canisters, and flow coating application techniques.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

P2 Fab is not subject to 326 IAC 20-48, 326 IAC 20-56, or any other rule under Article 8 and its unlimited VOC potential emissions are greater than twenty-five (25) tons per year. However, the source has elected to limit the VOC potential emissions from P2 Fab to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the fabrication facility P2 Fab shall be limited as follows:

- (1) The total VOC input to P2 Fab, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with this limit shall limit the potential to emit VOC from P2 Fab to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The fabrication facility P2 Fab, constructed after 1990, is not subject to 326 IAC 8-2-9 because the PTE VOC is less than fifteen (15) lb/day when coating metal. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)

P2 Fab is considered an industrial adhesive application process. P2 Fab has actual VOC emissions of greater than three (3) tons per twelve (12) month period before add-on controls; however, this facility is not located in Lake or Porter County. Therefore, the requirements of 326 IAC 8-22 do not apply.

Woodworking Operation WW-1

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), WW-1 is exempt from the requirements of 326 IAC 6-3-2 because the potential particulate emissions from the woodworking operation are less than five hundred fifty-one thousandths (0.551) pound per hour.

Woodworking Operation WW-2

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), WW-2 is exempt from the requirements of 326 IAC 6-3-2 because the potential particulate emissions from the woodworking operation are less than five hundred fifty-one thousandths (0.551) pound per hour.

Material Cutting

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the PVC and aluminum chop saws are exempt from the requirements of 326 IAC 6-3-2 because the potential particulate emissions from each operation are less than five hundred fifty-one thousandths (0.551) pound per hour.

Welding

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because each welding station uses less than six hundred twenty-five (625) pounds of rod or wire per day.

Compliance Determination, Monitoring and Testing Requirements

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

Compliance with the VOC usage limitations for P1 Fab and P2 Fab shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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 August 26, 2014.

The operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M087-34865-00679. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (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>.

**Emissions Calculations
Source Wide Summary of Emissions**

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

Plant 1 and Plant 2 Potential to Emit (Tons per Year)

Emission Units:	PM	PM₁₀	PM_{2.5}	SO₂	NO_x	VOC	CO	Highest Single HAP	Combined HAP
P1 & P2 Assembly	0.000	0.000	0.000	-	-	52.750	-	6.23 (MDI)	11.077
P1 & P2 Final Finish	0.000	0.000	0.000	-	-	0.337	-	negl	negl
P1 Lamination	0.000	0.000	0.000	-	-	negl	-	negl	negl
WW-1	1.481	1.481	1.481	-	-	-	-	-	-
WW-2	1.597	1.597	1.597	-	-	-	-	-	-
Welding	0.717	0.717	0.717	-	-	-	-	0.439 (manganese)	0.443
Natural Gas Combustion	0.031	0.124	0.124	0.010	1.637	0.090	1.375	0.026 (hexane)	0.031
Fugitives	0.374	0.088	0.013	-	-	-	-	-	-
TOTALS	4.200	4.007	4.007	0.010	1.637	53.177	1.375	6.23 (MDI)	11.551

**Appendix: Emissions Calculations
Potential VOC, HAP, and Particulate Emissions
from Surface Coating Operations
P1 Lamination**

**Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015**

Total PTE VOC : P1 Lamination																					
Process	Manufacturer	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC ⁽²⁾ (ton/yr)	PTE VOC ⁽³⁾ (ton/yr)	PTE PM/PM ₁₀ /PM _{2.5} (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Note Below)	Substrate		
P1 Lamination	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	2.0371	3.375	1.00	1.00	6.88	165.17	0.000	30.14	0.00	1.12	100%	Plastic/Wood		
P2 Lamination	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	0.2864	8.000	1.00	1.00	2.29	55.04	0.000	10.05	0.00	1.12	100%	Plastic/Wood		
Uncontrolled Potential VOC Emissions												9.18	220.21	0.00	40.19	0.00					

Total PTE HAP: P1 Lamination								
Process	Manufacturer	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MDI ⁽¹⁾	MDI Emissions ⁽²⁾ (ton/yr)	Total HAP Emissions ⁽²⁾ (ton/yr)	Total HAP Emissions ⁽³⁾ (ton/yr)
P1 Lamination	Forbo Adhesives	10.01	2.04	3.375	10.00%	0.000	0.000	30.14
P2 Lamination	Forbo Adhesives	10.01	0.29	8.000	10.00%	0.000	0.000	10.05
Uncontrolled Potential HAP Emissions							0.00	40.19

⁽¹⁾ MDI = Methylene diphenyl diisocyanate, CAS No. 9016-87-9

⁽²⁾ Calculated MDI/HAP emissions based on Center for the Polyurethanes Industry methodology cited below.

⁽³⁾ Calculated MDI/HAP emissions assuming complete MDI evaporation:

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

METHODOLOGY

Pure MDI is a solid at room temperature and has an extremely low vapor pressure (1.0 x 10⁻⁵ mm Hg @ 298.2 °K). MDI is also a highly reactive chemical which readily undergoes a chemical reaction to form a non volatile polyurethane polymer. Therefore, the potential VOC/HAP emissions are estimated by engineering calculations utilizing physical and chemical properties and fundamental relationships, such as, Raoult's law, Henry's law, and the ideal gas law.

The following formula, obtained from the cited reference, is used to estimate the potential MDI evaporative loss in a lamination process;

Formula $W = 25.4 * Vpmdi * (MW / Tproc) * u^{0.78} * SA * tTF * Kmdi$
 W = Evaporative Losses (grams/day)

VPmdi = Vapor Pressure at Temperature Used (Atmospheres) at process temperature

$3U115$ 1.023E-05 mm HG $1.346E-08$ Atm

MW = Molecular Weight (MDI = 250.26)

$2.50E+02$

Tproc = Process Temperature (Kelvin)

$2U566$ 7.70E+01 F $2.98E+02$ K

u = Air Flow Rate (m/s)

1.00E+02 ft/min $5.08E-01$ m/s

SA = Exposed Surface Area (Square Meters Exposed/Day)

Adhesive	Use	Units Annual (Average Size)	Maximum Area Coated Annual (ft2)	Maximum Area Coated per Day (ft2)	Maximum Area Exposed per Day (M2/Day)	Units	Emissions grams/day per Formula
3U115	Sidewalls Coverage	5000	3,750,000	10,273.97	954.48	M2	1.45E-04

tTF = Tack Free Time in Seconds (Default = 5 Seconds)

5.00 s

Kmdi = Vapor Pressure Adjustment Factor for Polyisocyanate Concentration

0.18 (80 degrees @ 10% MDI from Table B)

Potential Emission Rate	1.45E-04 grams/day	
Potential Emission Rate	6.06E-06 grams/hour	= grams/day / 24 hours/day
Potential Emission Rate	1.34E-08 lbs/hour	= grams/hour / 453.5 grams/lb
Potential Emission Rate	3.21E-07 lbs/day	= lbs/hour x 24 hours /day
Potential Emission Rate	5.85E-08 tons/year	= lbs/day x 365 days/year x 1/2,000 lb/ton

METHODOLOGY REFERENCE

Center for the Polyurethanes Industry: Estimating MDI Emissions for Section 313 of EPCRA Reporting, May 2012

**Appendix A: Emissions Calculations
Potential VOC, HAPs, and Particulate Emissions
from Surface Coating Operations
P1 Assembly & P2 Assembly⁽¹⁾**

**Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015**

Total PTE VOC: P1 Assembly and P2 Assembly																				
Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	PTE PMPM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Note Below)	Substrate
Assembly	Geocel	2300	Gen Purpose	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.6960	1.000	0.41	0.39	0.27	6.58	1.20	0.00	0.44	100%	Metal/Plastic
Assembly	Geocel	Color Match	Gen Purpose	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.1898	1.000	0.41	0.39	0.07	1.79	0.33	0.00	0.44	100%	Metal/Plastic
Assembly	Geocel	8100	Acetox Cure GP	8.01	3.00%	0.00%	3.00%	0.00%	96.74%	0.1875	1.000	0.24	0.24	0.05	1.08	0.20	0.00	0.25	100%	Metal/Plastic
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	2.50%	0.00%	2.50%	0.00%	97.05%	0.1580	1.000	0.22	0.22	0.03	0.82	0.15	0.00	0.22	100%	Wood/Fabric
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	3.00%	0.00%	3.00%	0.00%	96.73%	0.0990	1.000	0.24	0.24	0.02	0.57	0.10	0.00	0.25	100%	Wood/Fabric
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	46.42%	0.00%	46.42%	0.00%	59.63%	1.4990	1.000	2.97	2.97	4.45	106.88	19.51	0.00	4.98	100%	Wood/Fabric
Assembly	Hahn Systems	24B	Foam Sealant	9.18	24.00%	0.00%	24.00%	0.00%	70.07%	0.8152	1.000	2.20	2.20	1.80	43.11	7.87	0.00	3.14	100%	Wood/Fabric
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	56.20%	1.2499	1.000	3.03	2.93	3.66	87.78	16.02	0.00	5.21	100%	Wood/Fabric
Assembly	StaPut	SP90	StaPut Big Sticky	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	0.2990	1.000	3.25	2.59	0.77	18.59	3.39	0.00	6.18	100%	Wood/Fabric
Assembly	StaPut	SP80	StaPut Aerosol Adhesive	7.89	0.02%	0.00%	0.02%	0.00%	99.98%	0.0443	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood/Fabric
Assembly	Oatey	60E5	ABS Adhesive	7.34	75.00%	30.00%	45.00%	26.40%	25.20%	0.2564	1.000	4.49	3.30	0.85	20.33	3.71	0.00	13.11	100%	Plastic
Assembly	Premier	PB 925	Adhesive	9.69	10.84%	0.00%	10.84%	0.00%	85.73%	0.0597	1.000	1.05	1.05	0.06	1.51	0.27	0.00	1.23	100%	Plastic
Total Uncontrolled Potential VOC Emissions														12.04	289.04	52.75	0.00			

Note: Transfer Efficiency for Hand or Manual Application and Non-Atomized Application Techniques = 100%.

⁽¹⁾ Each plant fabrication facility (P1 Fab & P2 Fab) manufactures identical product units or very similar product model variations at a nominal rate of 0.5 unit/hour. Material usage for each fabrication facility equivalent sub-operation (i.e., Assembly, Lamination, and Final Finish) is aggregated and emissions are calculated based on a production rate of 1 unit per hour. Therefore, emissions for each fabrication facility sub-operation are 50% of the total calculated values.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
 PTE PM/PM10 (tons/yr) = (units/hour) * (gal/unit) * (lb/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

2. HAZARDOUS AIR POLLUTANTS

Total PTE HAP : P1 Assembly and P2 Assembly																	
Process	Manufacturer	Product Number	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % MDI ⁽²⁾	Weight % Tetrachloroethylene	Weight % Methylene Chloride	Weight % Xylene	Hexane Emissions (ton/yr)	MDI Emissions ⁽³⁾ (ton/yr)	Tetrachloroethylene Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Geocel	2300	Gen Purpose	9.85	6.96E-01	1.000	0.00%	0.00%	4.00%	0.00%	1.34%	0.00	0.00	1.20	0.00	0.40	1.60
Assembly	Geocel	Color Match	Gen Purpose	9.85	1.90E-01	1.000	0.00%	0.00%	4.00%	0.00%	1.34%	0.00	0.00	0.33	0.00	0.11	0.44
Assembly	Geocel	8100	Acetox Cure GP	8.01	1.88E-01	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	1.58E-01	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	9.90E-02	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	1.50E+00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	Hahn Systems	24B	Foam Sealant	9.18	8.15E-01	1.000	0.00%	19.00%	0.00%	0.00%	0.00%	0.00	6.23	0.00	0.00	0.00	6.23
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	1.25E+00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	StaPut	SP90	StaPut Big Sticky	6.08	2.99E-01	1.000	13.00%	0.00%	0.00%	0.00%	1.04	0.00	0.00	0.00	0.00	1.04	0.00
Assembly	Oatey	60E5	ABS Adhesive	7.34	2.56E-01	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Assembly	Premier	PB 925	Adhesive	9.69	5.97E-02	1.000	0.00%	0.00%	0.00%	70.00%	0.00%	0.00	0.00	0.00	1.77	0.00	1.77
Total Uncontrolled Potential HAP Emissions												1.04	6.23	1.53	1.77	0.51	11.08

⁽²⁾ MDI = Methylene diphenyl diisocyanate, CAS No. 9016-87-9

⁽³⁾ The source did not provide the additional information required to calculate the Assembly MDI emissions according to the Center for the Polyurethanes Industry protocol. Therefore, the MDI emissions were calculated assuming complete evaporation as a worst case.

METHODOLOGY

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

**Appendix A: Emissions Calculations
Potential VOC, HAPs, and Particulate Emissions
from Surface Coating Operations
P1 Final Finish & P2 Final Finish⁽¹⁾**

**Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015**

Process	Manufacturer	Part Number	Use	Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	PTE PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Note Below)	Substrate
Final Finish	US Polychemical	224704	Cleaner	Aqueous Cleaner	8.60	100.00%	98.28%	1.72%	0.00%	1.70%	0.0001	1.00	0.15	0.15	0.0000	0.00	0.000	0.00	8.70	100%	Metal/Plastic
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	0.0002	1.00	7.93	5.08	0.001	0.03	0.01	0.00	18.15	100%	Metal/Plastic
Final Finish	TCl	Acetone	Cleaner	Acetone	6.59	100.00%	100.00%	0.00%	100.00%	100.00%	0.0023	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Solvent/Cleaner
Final Finish	TCl	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0092	1.00	6.59	6.59	0.06	1.46	0.27	0.00	0.00	100%	Solvent/Cleaner
Final Finish	TCl	Mineral Spirits	Cleaner	Mineral Spirits	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0115	1.00	6.59	6.59	0.08	1.82	0.33	0.00	0.00	100%	Solvent/Cleaner

Potential to Emit	0.08	1.85	0.34	0.00
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Note: Transfer Efficiency for Hand or Manual Application and Non-Atomized Application Techniques = 100%.

⁽¹⁾ Each plant fabrication facility (P1 Fab & P2 Fab) manufactures identical product units or very similar product model variations at a nominal rate of 0.5 unit/hour. Material usage for each fabrication facility equivalent sub-operation (i.e., Assembly, Lamination, and Final Finish) is aggregated and emissions are calculated based on a production rate of 1 unit per hour. Therefore, emissions for each fabrication facility sub-operation are 50% of the total calculated values.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 PTE VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 PTE VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 PTE VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 PTE PM/PM10/PM2.5 (tons/yr) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

HAZARDOUS AIR POLLUTANTS

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Final Finish	US Polychemical	224704	Cleaner	Aqueous Cleaner	8.60	1.15E-04	1.000	0.00%	0.00%	1.00%	0.00%	-	-	4.33E-05	-	4.33E-05
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	2.30E-04	1.000	0.10%	0.01%	1.00%	1.00%	7.31E-06	6.95E-07	7.31E-05	7.31E-05	1.54E-04
Final Finish	TCl	Acetone	Cleaner	Acetone	6.59	2.30E-03	1.000	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-
Final Finish	TCl	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	9.20E-03	1.000	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-
Final Finish	TCl	Mineral Spirits	Cleaner	Mineral Spirits	6.59	1.15E-02	1.000	0.00%	0.00%	0.00%	0.00%	-	-	-	-	-

Uncontrolled Potential Emissions	7.31E-06	6.95E-07	1.16E-04	7.31E-05	1.98E-04
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METHODOLOGY

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

Appendix A: Emissions Calculations
Potential VOC Emissions
from Surface Coating Operations
when Coating Metal Substrate

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

1. VOC PTE when coating metal substrate:

Emission Unit	PTE VOC (lb/day)	PTE VOC (ton/yr)
P1 Assembly	4.73	0.86
P2 Assembly	4.73	0.86
P1 Lamination	0.00	0.00
P2 Lamination	0.00	0.00
P1 Final Finish	0.014	0.003
P2 Final Finish	0.014	0.003

**Appendix A: Emissions Calculations
Process Particulate Emissions
Particulate Emissions from Plant 1 Woodworking Operation (WW-1)**

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

One (1) PVC Chop Saws 1CS1																
10.00	cuts/hr	x	4.000	in diameter pipe	x	3.14	pi	x	0.1250	in thick pipe wall	x	0.125	in thick blade	=	1.96	in ³ loss/hr
1.96	in ³ loss/hr	/	1,728	in ³ /ft ³	x	87.71	lb/ft ³	=	0.10	lb loss/hr						

Two (2) Aluminum Chop Saws 1CS2-3																
10.00	cuts/hr	x	4.00	in long	x	0.125	in thick	x	0.125	in wide	=	0.625	in ³ loss/hr			
0.63	in ³ loss/hr	/	1,728	in ³ /ft ³	x	168.43	lb/ft ³	=	0.06	lb loss/hr						

Five (5) Chop Saws 1CS4-8																
20.00	cuts/hr	x	1.50	in long	x	1.50	in thick	x	0.125	in wide	=	5.625	in ³ loss/hr			
5.63	in ³ loss/hr	/	1,728	in ³ /ft ³	x	40.00	lb/ft ³	=	0.13	lb loss/hr						

One (1) Band Saw 1BS1																
10.00	BF/hr	/	4	BF/piece	=	2.5	pieces/hr									
2.50	pieces/hr	x	6.00	holes/piece	x	3.14	pi	x	0.0156	r ² *	x	1.5	in depth	=	1.10	in ³ loss/hr
*1/4 in curf																
1.10	in ³ loss/hr	/	1,728	in ³ /ft ³	x	40.00	lb/ft ³	=	0.03	lb loss/hr						

Six (6) Hand Routers 1HR1-6															
120.00	feet/hr	x	0.125	in wide bit	x	0.06	in depth (edge trimming)	=	0.94	in ³ loss/hr					
0.94	in ³ loss/hr	/	1,728	in ³ /ft ³	x	40.00	lb/ft ³	=	0.02	lb loss/hr					

Total Emissions Estimate =	0.34 lb/hr														
Total Uncontrolled PM Emission:	1.48 tons/year														

**Appendix A: Emissions Calculations
Process Particulate Emissions
Particulate Emissions from Plant 2 Woodworking Operation (WW-2)**

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

One (1) Radial Arm Saw 2RS1													
10.00	cuts/hr	x	4.00	in long	x	0.125	in thick	x	0.125	in wide	=	0.625	in ³ loss/hr
0.63	in ³ loss/hr	/	1,728	in ³ /ft ³	x	168.43	lb/ft ³	=	0.06	lb loss/hr			

Two (2) Table Saws 2TS2-3													
20.00	cuts/hr	x	4.00	in long	x	0.125	in thick	x	0.125	in wide	=	1.25	in ³ loss/hr
1.25	in ³ loss/hr	/	1,728	in ³ /ft ³	x	168.43	lb/ft ³	=	0.12	lb loss/hr			

Six (6) Chop Saws 2CS1-6													
24.00	cuts/hr	x	1.50	in long	x	1.50	in thick	x	0.125	in wide	=	6.75	in ³ loss/hr
6.75	in ³ loss/hr	/	1,728	in ³ /ft ³	x	40.00	lb/ft ³	=	0.16	lb loss/hr			

One (1) Band Saw 2BS1																
10.00	BF/hr	/	4	BF/piece	=	2.5	pieces/hr									
2.50	pieces/hr	x	6.00	holes/piece	x	3.14	pi	x	0.0156	r ²	x	1.5	in depth	=	1.10	in ³ loss/hr
1/4 in diameter bit																
1.10	in ³ loss/hr	/	1,728	in ³ /ft ³	x	40.00	lb/ft ³	=	0.03	lb loss/hr						

Total Emissions Estimate =	0.36 lb/hr												
Total Uncontrolled PM Emission:	1.60 tons/year												

Appendix A: Emissions Calculations
Process Particulate Emissions
Potential Particulate Emissions from Welding Operations

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Pounds Electrode per Hour	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
				PM/PM10/ PM2.5	Mn	Ni	Co	Cr	PM/PM10/ PM2.5	Mn	Ni	Co	Cr	
WELDING														
Metal Inert Gas (MIG)(E70S)	7	4.50	31.50	5.20E-03	3.18E-03	1.00E-05	1.00E-05	1.00E-05	1.64E-01	1.00E-01	3.15E-04	3.15E-04	3.15E-04	1.01E-01
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
				PM/PM10/ PM2.5	Mn	Ni	Co	Cr	PM/PM10/ PM2.5	Mn	Ni	Co	Cr	
Oxyacetylene/Electric Arc	0	0.00		1.62E-01	5.00E-04	1.00E-04	0.00E+00	3.00E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EMISSION TOTALS														
Potential Emissions lbs/hr									1.64E-01	1.00E-01	3.15E-04	3.15E-04	3.15E-04	1.01E-01
Potential Emissions lbs/day									3.93	2.40E+00	7.56E-03	7.56E-03	7.56E-03	2.43
Potential Emissions tons/year									7.17E-01	4.39E-01	1.38E-03	1.38E-03	1.38E-03	0.44

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

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

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Plant 1: Six (6) Natural Gas-fired Thermocyclers @ 0.464 MMBtu, each (H1 - H6) Plant 2: One (1) Natural Gas-fired Thermocycler @ 0.464 MMBtu, (H7) Plant 2: Three (3) Natural Gas-fired Radiant Tube Heaters @ 0.120 MMBtu, each (H8-H11) Plant 2: Two (2) Natural Gas-fired Radiant Tube Heaters @ 0.08 MMBtu, each (H12-H13)
3.81	1020	32.7	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.1	0.1	0.0	1.6	0.1	1.4

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - 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	3.438E-05	1.964E-05	1.228E-03	2.946E-02	5.566E-05	3.080E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - 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	8.185E-06	1.801E-05	2.292E-05	6.220E-06	3.438E-05	8.970E-05
	Total HAPs					3.089E-02
	Worst HAP					2.946E-02

Methodology is the same as above.

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

Methodology

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads
Plant 1 and Plant 2**

Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	5.0	1.0	5.0	25.0	125.0	100	0.019	0.1	34.6
Vehicle (leaving plant) (one-way trip)	5.0	1.0	5.0	25.0	125.0	100	0.019	0.1	34.6
Totals			10.0		250.0			0.2	69.1

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

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	25.0	25.0	25.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.70	1.71	0.17	lb/mile
Mitigated Emission Factor, Eext =	4.50	1.15	0.11	lb/mile
Dust Control Efficiency =	0%	0%	0%	(source does not hve a fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.12	0.03	0.00	0.08	0.02	0.00	0.08	0.02	0.00
Vehicle (leaving plant) (one-way trip)	0.12	0.03	0.00	0.08	0.02	0.00	0.08	0.02	0.00
Totals	0.23	0.06	0.01	0.16	0.04	0.00	0.16	0.04	0.00

Methodology

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
- Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
- Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

**Appendix A: Emissions Calculations
Fugitive Dust Emissions - Paved Roads
Plant 1 and Plant 2**

**Company Name: Highland Ridge RV, Inc.
Address City IN Zip: 3195 North State Road 5, Shipshewana, IN 46565
MSOP No.: M089-34865-00679
Permit Reviewer: Donald McQuigg
Date: February 20, 2015**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	5.0	1.0	5.0	15.0	75.0	300	0.057	0.3	103.7
Vehicle (leaving plant) (one-way trip)	5.0	1.0	5.0	15.0	75.0	300	0.057	0.3	103.7
Total			10.0		150.0			0.6	207.4

Average Vehicle Weight Per Trip = $\frac{15.0}{1.0}$ tons/trip
Average Miles Per Trip = $\frac{0.06}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	1.10E-02	2.20E-03	5.40E-04	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading for paved roads at iron & steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p = $\frac{120}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	1.377	0.275	0.068	lb/mile
Mitigated Emission Factor, E_{ext} =	1.264	0.253	0.062	lb/mile
Dust Control Efficiency =	0%	0%	0%	(source does not have a fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	7.1E-02	1.4E-02	3.5E-03	6.6E-02	1.3E-02	3.2E-03	6.6E-02	1.3E-02	3.2E-03
Vehicle (leaving plant) (one-way trip)	7.1E-02	1.4E-02	3.5E-03	6.6E-02	1.3E-02	3.2E-03	6.6E-02	1.3E-02	3.2E-03
	0.143	0.029	0.007	0.131	0.026	0.006	0.131	0.026	0.006

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Jason Martin
Highland Ridge RV, Inc.
3195 North State Road 5
Shipshewana, IN 46565

DATE: February 20, 2015

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

SUBJECT: Final Decision
New Source Construction and Minor Source Operating Permit (MSOP)
087-34865-00679

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:
Ted Buchanan, SEM
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



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

February 20, 2015

TO: LaGrange Public Library, Shippshewana Branch

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

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

Applicant Name: Highland Ridge RV, Inc.
Permit Number: 087-34865-00679

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

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1		Jason Martin Highland Ridge RV Inc 3195 N SR 5 Shipshewana IN 46565 (Source CAATS)										
2		Ted Buchanan SEM Highland Ridge RV Inc 903 S Main St Middlebury IN 46540 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
5		Shipshewana Town Council and Town Manager P.O. Box 486 Shipshewana IN 46565 (Local Official)										
6		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
7		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
8		Attn: Shipshewana Branch 203 West Spring Street LaGrange IN 46761 (Library)										
9		Alvin Beechy 5355 W 400 S Topeka IN 46571 (Affected Party)										
10		Homer H Lambright PO Box 7093 Sarasota FL 34278 (Affected Party)										
11		Harry Scott 5880 N 175 W Howe IN 46574 (Affected Party)										
12		Dennis R Troyer 280 E North Vilage Dr. Ste D Shipshewana IN 46565 (Affected Party)										
13		Baker Boys Investment, LLC 18711 Whispering Pines White Pigeon MI 49099 (Affected Party)										
14		Pease Properties, Inc. 3663 14 Mile Road Cedar Springs MI 49319 (Affected Party)										
15		CRS Investments, LLC PO Box 246 Shipshewana IN 46565 (Affected Party)										

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