



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

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Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)

for Highland Ridge RV, Inc. in LaGrange County

Significant Permit Revision No.: 087-36623-00679

The Indiana Department of Environmental Management (IDEM) has received an application from Highland Ridge RV, Inc., located at 3195 North SR 5, Shipshewana, IN 46565, for a significant revision of its MSOP issued on February 20, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Highland Ridge RV, Inc. to make certain changes at its existing source. Highland Ridge RV, Inc. has applied to construct a new recreational vehicle manufacturing line in a new building contiguous to Plant 1.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Shipshewana Branch Public Library
250 Depot Street
Shipshewana, IN 46565

and

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 087-36623-00679 in all correspondence.

Comments should be sent to:

Doug Logan
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5328
Or dial directly: (317) 234-5328
Fax: (317) 232-6749 attn: Doug Logan
E-mail: dlogan@idem.IN.gov

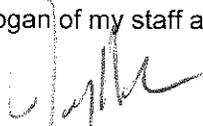
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Doug Logan or my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



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Mr. Jason Martin
Highland Ridge RV Inc.
3195 N SR 5
Shipshewana, IN 46565

Re: 087-36623-00679
Significant Revision to
M087-34865-00679

Dear Mr. Martin:

Highland Ridge RV Inc. was issued a Minor Source Operating Permit (MSOP) No. M087-34865-00679 on February 20, 2015 for a stationary travel trailer manufacturer located at 3195 N S.R.5 & 0925 N S.R.5 Shipshewana Indiana 46565. On December 16, 2015, the Office of Air Quality (OAQ) received an application from the source requesting the addition of a new RV manufacturing line. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit.

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Doug Logan of my staff at 317-234-5328 or 1-800-451-6027, and ask for extension 4-5328

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA /dal

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



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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: Original Signed By Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 20, 2015 Expiration Date: February 20, 2020

Significant Permit Revision No.: 087-36623-00679	
Issued by: Jenny Acker, Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: February 20, 2020



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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 (Travel Trailers and Campers)
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 Line 1, constructed in 2015, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
 - (1) Two (2) laminators for RV roof, sidewall, and floor panels, identified as Laminators 1 & 2, constructed in 2015, 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 Line 1 Final Finish, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (3) One (1) assembly operation, identified as Line 1 Assembly, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.

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- (b) One (1) woodworking operation, identified as WW-1, constructed in 2015, 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, constructed in 2015, 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, constructed in 2015, 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-MIG7, nominally rated for a maximum capacity of 3.5 pounds electrode per day, 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 outdoors, and consisting of:
 - (1) Five (5) natural gas-fired space heaters, identified as H1-H5, constructed in 2015, each rated at 0.464 million British thermal units per hour (MMBtu/hr).
 - (2) Five (5) natural gas-fired Thermocyclers in the lamination building, identified as H12 - H16, permitted in 2016, with a maximum heat input capacity of 0.464 million British thermal units per hour (MMBtu/hr), each.
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) One (1) fabrication facility, identified as Line 3, with a nominal capacity of 4.0 recreational travel trailers per hour, consisting of the following operations:
 - (1) One (1) final finish operation, identified as Line 3 Final Finish, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 3 Assembly, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
 - (3) One (1) welding operation, identified as Line 3 Welding, approved in 2016 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:
 - (A) Three (3) metal inert gas (MIG) welding stations, identified as MIG8-MIG10, nominally rated for a maximum capacity of 3.5 pounds electrode per day, each.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:

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- (1) Four (4) natural gas-fired Thermocyclers, identified as H17-H20, approved in 2016 for construction, with a maximum heat input capacity of 0.55 million British thermal units per hour (MMBtu/hr), each.

Plant 2

- (a) One (1) fabrication facility, identified as Line 2, constructed in 2015, 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 Line 2 Final Finish, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 2 Assembly, constructed in 2015, 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 outdoors, and consisting of:
 - (1) Three (3) natural gas-fired radiant tube heaters, identified as H7-H9, constructed in 2015, each rated at 0.120 million British thermal units per hour (MMBtu/hr);
 - (2) Two (2) natural gas-fired radiant tube heaters, identified as H11 and H12, constructed in 2015, each rated at 0.080 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired Thermocycler, identified as H6, constructed in 2015, rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (c) One (1) woodworking operation, identified as WW-2, constructed in 2015, 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]

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SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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B.10 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

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

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

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

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

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

Indiana Department of Environmental Management

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

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

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

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

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

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

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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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.

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- (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.

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- (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

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- (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

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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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

- (a) One (1) fabrication facility, identified as Line 1, constructed in 2015, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
- (1) Two (2) laminators for RV roof, sidewall, and floor panels, identified as Laminators 1 & 2, constructed in 2015, 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 Line 1 Final Finish, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (3) One (1) assembly operation, identified as Line 1 Assembly, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:
- (1) Five (5) natural gas-fired space heaters, identified as H1-H5, constructed in 2015, each rated at 0.464 million British thermal units per hour (MMBtu/hr).
 - (2) Five (5) natural gas-fired Thermocyclers in the lamination building, identified as H12-H16, permitted in 2016, with a maximum heat input capacity of 0.464 million British thermal units per hour (MMBtu/hr), each.

(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, identified as Line 1, shall be limited as follows:

- (1) The total VOC input to Line 1, 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 to Line 1.

D.1.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each Thermocycler shall be limited to 0.6 pounds per MMBtu heat input.

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

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

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

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

D.1.4 Record Keeping Requirement

- (a) To document the compliance status 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 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 and each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 2

- (a) One (1) fabrication facility, identified as Line 2, constructed in 2015, 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 Line 2 Final Finish, constructed in 2015, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 2 Assembly, constructed in 2015, 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 outdoors, and consisting of:
- (1) Three (3) natural gas-fired radiant tube heaters, identified as H7-H9, constructed in 2015, each rated at 0.120 million British thermal units per hour (MMBtu/hr);
 - (2) Two (2) natural gas-fired radiant tube heaters, identified as H11 and H12, constructed in 2015, each rated at 0.080 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired space heater, identified as H6, constructed in 2015, rated at 0.464 million British thermal units per hour (MMBtu /hr).

(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, identified as Line 2, shall be limited as follows:

- (1) The total VOC input to Line 2, 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 Line 2 and shall render the requirements of 326 IAC 8-1-6 not applicable to Line 2.

D.2.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Radiant tube heaters	H7 - H9	0.6

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Emission Unit	Unit ID	Pt (lb/MMBtu)
Radiant tube heaters	H11 - H12	0.6
Thermocycler	H6	0.6

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

D.2.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, 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 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 and each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.5 Reporting 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).

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

- (g) One (1) fabrication facility, identified as Line 3, with a nominal capacity of 4.0 recreational travel trailers per hour, consisting of the following operations:
- (1) One (1) final finish operation, identified as Line 3 Final Finish, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 3 Assembly, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:
- (1) Four (4) natural gas-fired Thermocyclers, identified as H17-H20, approved in 2016 for construction, with a maximum heat input capacity of 0.55 million British

(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.3.1 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 VOC input to the fabrication facility, identified as Line 3, 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 Line 3 and shall render the requirements of 326 IAC 8-1-6 not applicable to Line 3.

D.3.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each Thermocycler shall be limited to 0.6 pounds per MMBtu heat input.

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

D.3.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

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

DRAFT

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

D.3.4 Record Keeping Requirement

- (a) To document the compliance status with Condition D.3.1, 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.3.1. 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 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 and each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition

D.3.5 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.3.1 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).

DRAFT

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: Line 1
Pollutant: VOC
Limit: The total VOC input to Line 1, 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.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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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: Line 2
Pollutant: VOC
Limit: The total VOC input to Line 2, 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.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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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: Line 3
Pollutant: VOC
Limit: The VOC input to the fabrication facility, identified as Line 3, 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.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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**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:

DRAFT

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

DRAFT

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Description and Location
--

Source Name:	Highland Ridge RV Inc.
Source Location:	3195 N SR 5 & 0925 N SR 5, Shipshewana, IN, 46565
County:	LaGrange
SIC Code:	3792 (Travel Trailers and Campers)
Operation Permit No.:	087-34865-00679
Operation Permit Issuance Date:	February 20, 2015
Significant Permit Revision No.:	087-36623-00679
Permit Reviewer:	Doug Logan

On December 16, 2015, the Office of Air Quality (OAQ) received an application from Highland Ridge RV Inc. related to the construction of an additional manufacturing building at the 3195 North SR 5 location, designated Line 3.

Existing Approvals

The source was issued MSOP No. M087-34865-00679 on February 20, 2015. There have been no subsequent approvals issued.

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

Status of the Existing Source

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, prior to the proposed revision:

This PTE table is from the TSD Appendix A of MSOP No. 087-34865-00679, issued on February 20, 2015.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
P1 & P2 Assembly	0	0	0	--	--	52.750	--	11.077	6.228 (MDI)
P1 & P2 Final Finish	0	0	0	--	--	0.337	--	negl	negl
P1 & P2 Lamination	0	0	0	--	--	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	--	--	--	--	0.443	0.439 (Manganese)
Natural Gas combustion	0.031	0.124	0.124	0.010	1.637	0.090	1.375	0.031	0.029 (n-Hexane)
Total PTE of Entire Source Excluding Fugitives	3.826	3.919	3.919	0.010	1.637	53.177	1.375	11.551	6.23 (MDI)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions	8.027	0.088	0.013	--	--	--	--	--	--
Total PTE of Entire Source Including Fugitives	4.200	4.007	3.932	0.010	1.637	53.177	1.375	11.551	6.23 (MDI)
MSOP Threshold	25	25	25	25	25	25	-	-	-

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Highland Ridge RV Inc. on December 16, 2015, relating to the addition of a new recreational vehicle manufacturing line in a new building contiguous to Plant 1.

The following is a list of the new emission units:

- One (1) fabrication facility, identified as Line 3, with a nominal capacity of 4.0 recreational travel trailers per hour, consisting of the following operations:
 - (1) One (1) final finish operation, identified as Line 3 Final Finish, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 3 Assembly, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
 - (3) One (1) welding operation, identified as Line 3 Welding, approved in 2016 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:
 - (A) Three (3) metal inert gas (MIG) welding stations, identified as MIG8-MIG10, nominally rated for a maximum capacity of 3.5 pounds electrode per day, each.
- Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:
 - (1) Four (4) natural gas-fired Thermocyclers, identified as H17-H20, approved in 2016 for construction, with a maximum heat input capacity of 0.55 million British thermal units per hour (MMBtu/hr), each.

The following are existing emission units not specifically identified in the current operating permit.

Pursuant to 326 IAC 2-1.1-3(e) modifications with a PTE less than the levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) are exempt from the permit revision requirements under 326 IAC 2-6.1-6, including the requirement to submit an application.

- Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:
 - (1) Five (5) natural gas-fired Thermocyclers in the lamination building, identified as H12-H16, permitted in 2016, with a maximum heat input capacity of 0.464 million British thermal units per hour (MMBtu/hr), each.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

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

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	0.43
PM ₁₀	0.54
PM _{2.5}	0.54
SO ₂	1.16E-02
NO _x	1.94
VOC	43.86
CO	1.63
Single HAPs	<10
Total HAPs	4.18

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Increase from Modification (ton/yr)
PM	0.13	1.16	1.03
PM ₁₀	2.62E-02	0.99	0.96
PM _{2.5}	6.43E-03	0.95	0.95
SO ₂	-	-	-
NO _x	-	-	-
VOC	52.75	52.75	3.66E-03
CO	-	-	-
HAPs	11.08	6.73	3.83E-07

Total PTE Increase due to the Modification			
Pollutant	PTE New Emission Units (ton/yr)	Increase to PTE of Modified Emission Units (ton/yr)	Total PTE for New and Modified Units (ton/yr)
PM	0.43	1.03	1.45
PM ₁₀	0.54	0.96	1.50
PM _{2.5}	0.54	0.95	1.49
SO ₂	1.16E-02	-	1.16E-02
NO _x	1.94	-	1.94
VOC	43.86	3.66E-03	43.86
CO	1.63	-	1.63
HAPs	4.18	3.83E-07	4.18

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of VOC.

PTE of the Entire Source After Issuance of the MSOP Revision

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (MDI)
P1 & P2 Assembly	0	0	0	--	--	52.750	--	11.077	6.228 (MDI)
P1 & P2 Final Finish	0	0	0	--	--	0.337	--	negl	negl
P1 & P2 Lamination	0	0	0	--	--	negl	--	negl	negl
Lamination	--	--	--	--	--	3.83E-07	--	3.83E-07	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	--	--	26.38	--	3.36	0.93
Line 1 Final Finish	--	--	--	--	--	0.17	--	9.88E-05	--
Line 2 Assembly	0.47	0.47	0.47	--	--	26.38	--	3.36	0.93
Line 2 Final Finish	--	--	--	--	--	0.17	--	9.88E-05	--
Line 3 Assembly	0.38	0.38	0.38	--	--	43.46	--	4.14	1.49
Line 3 Final Finish	--	--	--	--	--	0.29	--	7.90E-04	--
WW-1 and MC-1	1.481 1.48	1.481 1.48	1.481 1.48	--	--	--	--	--	--
WW-2	1.597 1.60	1.597 1.60	1.597 1.60	--	--	--	--	--	--
Welding	0.717 3.32E-02	0.717 3.32E-02	0.717 3.32E-02	--	--	--	--	0.443 2.05E-03	0.439 (Manganese) --
Natural Gas Combustion	0.031 6.38E-02	0.124 0.26	0.124 0.26	0.010 2.02E-02	1.637 3.36	0.090 0.18	1.375 2.82	0.034 6.34E-02	0.029 (n-Hexane) --
Total PTE of Entire Source Excluding Fugitives	3.826 4.50	3.919 4.70	3.919 4.70	0.010 2.02E-02	1.637 3.36	53.177 97.03	1.375 2.82	11.551 10.93	6.23 (MDI) 3.36
Title V Major Source Thresholds	--	100	100	100	100	100	100	25	10
Fugitive Emissions	0.374 0.16	0.088 3.96E-02	0.013 3.96E-03	--	--	--	--	--	--
Unpaved Roads	0.21 4.19E-02	1.03E-02 1.03E-02	1.03E-02 1.03E-02	--	--	--	--	--	--
Paved Roads	4.200 4.87	4.007 4.78	4.007 4.71	0.010 2.02E-02	1.637 3.36	53.177 97.03	1.375 2.82	11.551 10.93	6.23 (MDI) 3.36
Total PTE of Entire Source Including Fugitives	4.200 4.87	4.007 4.78	4.007 4.71	0.010 2.02E-02	1.637 3.36	53.177 97.03	1.375 2.82	11.551 10.93	6.23 (MDI) 3.36
MSOP Threshold	25	25	25	25	25	25	-	-	-

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (MDI)
Lamination	--	--	--	--	--	3.83E-07	--	3.83E-07	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	--	--	26.38	--	3.36	0.93
Line 1 Final Finish	--	--	--	--	--	0.17	--	9.88E-05	--
Line 2 Assembly	0.47	0.47	0.47	--	--	26.38	--	3.36	0.93
Line 2 Final Finish	--	--	--	--	--	0.17	--	9.88E-05	--
Line 3 Assembly	0.38	0.38	0.38	--	--	43.46	--	4.14	1.49
Line 3 Final Finish	--	--	--	--	--	0.29	--	7.90E-04	--
WW-1 and MC-1	1.48	1.48	1.48	--	--	--	--	--	--
WW-2	1.60	1.60	1.60	--	--	--	--	--	--
Welding	3.32E-02	3.32E-02	3.32E-02	--	--	--	--	2.05E-03	--
Natural Gas Combustion	6.38E-02	0.26	0.26	2.02E-02	3.36	0.18	2.82	6.34E-02	--
Total PTE of Entire Source Excluding Fugitives	4.50	4.70	4.70	2.02E-02	3.36	97.03	2.82	10.93	3.36
Title V Major Source Thresholds	--	100	100	100	100	100	100	25	10
Unpaved Roads	0.16	3.96E-02	3.96E-03	--	--	--	--	--	--
Paved Roads	0.21	4.19E-02	1.03E-02	--	--	--	--	--	--
Total PTE of Entire Source Including Fugitives	4.87	4.78	4.71	2.02E-02	3.36	97.03	2.82	10.93	3.36
MSOP Threshold	25	25	25	25	25	25	--	--	--
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .									

MSOP Status

- (1) **Criteria Pollutants**
 This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

- (2) **HAPs**
 This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Permit Level Determination – PSD

- (a) **PSD Minor Source – PM**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

(a) New Source Performance Standards (NSPS)

- (1) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included for this proposed revision, since the source is not an automobile or light truck assembly plant.
- (2) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

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

- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63.800, Subpart JJ and 326 IAC 20-14, are not included for this proposed revision because the source does not manufacture wood furniture or wood furniture components, and the source is not a major source of HAP emissions.
- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII and 326 IAC 20-85, are not included for this proposed revision because the source does not apply topcoats to new automobile or light truck bodies or body parts, and the source is not a major source of HAP emissions.
- (3) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM, and 326 IAC 20-80, are not included for this proposed revision because the source is not a major source of HAP emissions.
- (4) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP, and 326 IAC 20-81, are not included for this proposed revision because the source is not a major source of HAP emissions.
- (5) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, because Line 3 will not perform spray application of surface coatings to assembled motor vehicles or mobile equipment .
- (6) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, because the Line 3 welding processes are not one of the source categories listed in Table 1 to Subpart XXXXXX of Part 63.
- (7) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

(c) Compliance Assurance Monitoring (CAM)

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

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
 MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
 See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
 The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
 See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (e) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
 Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility (Bold units have been added)	Construction Date (Removal Date)	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Plant 1 thermocyclers (H1-H5)	2015	5 x 0.464	3.30	0.80	0.6	0.002
Plant 2 thermocycler (H6)	2015	0.464	3.30	0.80	0.6	0.002
Plant 2 radiant tube heaters (H7-H9)	2015	3 x 0.120	3.30	0.80	0.6	0.002

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility (Bold units have been added)	Construction Date (Removal Date)	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Plant 2 radiant tube heaters (H10-H11)	2015	2 x 0.08	3.30	0.80	0.6	0.002
Lamination thermocyclers	permitted in 2016	5 x 0.464	7.82	0.64	0.6	0.002
Line 3 thermocyclers (H13-H16)	2016	4 x 0.55	7.82	0.64	0.6	0.002

Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

- (e) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) IDEM, OAQ has determined that application of SP90 Big Sticky adhesive in RV assembly operations at this source when using non-atomizing spray guns does not generate particulate emissions. Therefore, 326 IAC 6-3-2 is not applicable.
 - (2) Pursuant to 326 IAC 6-3-1(b)(15), 326 IAC 6-3 is not applicable to the RV assembly and final finish operation identified as Line 3 because the surface coating manufacturing processes, not otherwise exempted by 326 IAC 6-3-1(b)(5) through (8), use less than five (5) gallons per day.
 - (3) Pursuant to 326 IAC 6-3-1(b)(9), the welding processes are exempt from 326 IAC 6-3 because the processes consume less than 625 pounds of rod or wire per day.
- (f) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The unlimited VOC potential emissions from Line 3 is greater than twenty-five (25) tons per year. However, the source shall limit the potential VOC emissions from Line 3 to less than twenty-five (25) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Line 3 shall be limited as follows:

 - (1) The VOC emissions from Line 3, including assembly and final finishing, 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 these limits shall limit the potential to emit VOC from Line 3 to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.
- (g) 326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination requirements applicable to this proposed revision are as follows:
 - (1) Compliance with the VOC usage limitations for Line 3 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.
- (b) There are no compliance monitoring requirements applicable to this proposed revision.
- (c) There are no testing requirements applicable to this proposed revision.

Proposed Changes

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

Summary of IDEM Updates Throughout the Permit

- (a) Descriptive information about new and modified emissions units and insignificant activities has been added or updated.
- (b) IDEM deleted Conditions B.2 - Revocation of Permit and B.3 - Affidavit of Construction because the source completed construction and received a validation letter. Subsequent conditions were renumbered.
- (c) IDEM, OAQ revised Condition C.2 - Permit Revocation because the permit is no longer a permit to construct.
- (d) IDEM has determined the preventive maintenance plans are not required for the units in Sections D.1 and D.2. Therefore, Conditions D.1.2 and D.2.2, the preventive maintenance plan requirements, have been deleted.
- (d) IDEM added the rule citation 326 IAC 2-6.1-5(a)(2) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions.
- (e) IDEM, OAQ deleted the Affidavit of Construction form because the affidavit was received on March 6, 2015.

Section A - Revisions

- (a) The SIC Code description has been added in Condition A.1 - General Information.
- (b) Section A has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section A has been revised as follows:

...

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

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

Source Address: 3195 North State Road 5, Shipshewana, Indiana 46565
General Source Phone Number: (260) 768-7771
SIC Code: 3792 (**Travel Trailers and Campers**)

...

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~~ **Line 1, constructed in 2015**, with a nominal capacity of 0.5 recreational travel trailer per hour, consisting of the following operations:
- (1) ~~One (1) lamination operation~~ **Two (2) laminators for RV roof, sidewall, and floor panels**, identified as ~~P1 Lamination, approved~~ **Laminators 1 & 2, constructed 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~~ **Line 1 Final Finish, approved constructed 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~~ **Line 1 Assembly, approved constructed 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~~ **constructed 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~~ **constructed 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~~ **constructed 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~~ **MIG7**, nominally rated for a maximum capacity of ~~4.5~~ **3.5** pounds electrode per ~~hour~~ **day**, 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~~ **outdoors**, and consisting of:
- (1) ~~Six (6)~~ **Five (5)** natural gas-fired space heaters, identified as ~~H1-H6~~ **H5**, **constructed in 2015**, each rated at 0.464 million British thermal units per hour

(MMBtu/hr).

- (2) **Five (5) natural gas-fired Thermocyclers in the lamination building, identified as H12 - H16, permitted in 2016, with a maximum heat input capacity of 0.464 million British thermal units per hour (MMBtu/hr), each.**
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) **One (1) fabrication facility, identified as Line 3, with a nominal capacity of 4.0 recreational travel trailers per hour, consisting of the following operations:**
 - (1) **One (1) final finish operation, identified as Line 3 Final Finish, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.**
 - (2) **One (1) assembly operation, identified as Line 3 Assembly, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.**
 - (3) **One (1) welding operation, identified as Line 3 Welding, approved in 2016 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:**
 - (A) **Three (3) metal inert gas (MIG) welding stations, identified as MIG8-MIG10, nominally rated for a maximum capacity of 3.5 pounds electrode per day, each.**
- (h) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:**
 - (1) **Four (4) natural gas-fired Thermocyclers, identified as H17-H20, approved in 2016 for construction, with a maximum heat input capacity of 0.55 million British thermal units per hour (MMBtu/hr), each.**

Plant 2

- (a) One (1) fabrication facility, identified as ~~P2-Fab~~ **Line 2**, ~~approved~~ **constructed** 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~~ **Line 2** Final Finish, ~~approved~~ **constructed** 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~~ **Line 2** Assembly, ~~approved~~ **constructed** in 2015 ~~for construction~~, 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~~ **outdoors**, and consisting of:

- (1) Three (3) natural gas-fired radiant tube heaters, identified as ~~H8-H11~~**H7-H9**, **constructed in 2015**, 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-H11~~ and ~~H13~~**H12**, **constructed in 2015**, 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~~**H6**, **constructed in 2015**, rated at 0.464 million British thermal units per hour (MMBtu/hr).
- (c) One (1) woodworking operation, identified as WW-2, ~~approved~~**constructed** 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 ~~saw~~**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 and Section C - Revisions

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

Section B and Section C has been revised as follows:

...

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

(a) ...

B.53 Term of Conditions [326 IAC 2-1.1-9.5]

...

B.64 Enforceability

...

B.75 Severability

...

B.86 Property Rights or Exclusive Privilege

...

B.97 Duty to Provide Information

(a) ...

B.108 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) ...

B.119 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) ...

B.1210 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) ...

B.1311 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

...

B.1412 Permit Renewal [326 IAC 2-6.1-7]

(a) ...

B.1513 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) ...

B.1614 Source Modification Requirement

...

B.1715 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

...

B.1816 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) ...

B.1917 Annual Fee Payment [326 IAC 2-1.1-7]

(a) ...

B.2018 Credible Evidence [326 IAC 1-1-6]

...

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) ...

Section D.1 - Revisions

- (a) IDEM added a new Condition D.1.2 - Particulate Emissions Limitation to incorporate applicable requirements for sources of indirect heating.
- (b) IDEM, OAQ updated Condition D.1.4 - Volatile Organic Compounds to current model language.
- (c) IDEM, OAQ updated Condition D.1.5 - Record Keeping Requirement to current model language.
- (d) Section D.1 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section D.1 has been revised as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

- (a) One (1) fabrication facility, identified as ~~P1 Fab, approved~~ **Line 1, constructed** 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~~ **Two (2) laminators for RV roof, sidewall, and floor panels**, identified as ~~P1 Lamination, approved~~ **Laminators 1 & 2, constructed** 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 ~~P4~~ **Line 1 Final Finish, approved** **constructed** 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 ~~P4~~ **Line 1 Assembly, approved** **constructed** 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.
- (e) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:**
 - (1) **Five (5) natural gas-fired space heaters, identified as H1-H5, each rated at 0.464 million British thermal units per hour (MMBtu/hr).**
 - (2) **Five (5) natural gas-fired Thermocyclers in the lamination building, identified as H12 - H16, permitted in 2016, with a maximum heat input capacity of 0.464 million British thermal units per hour (MMBtu/hr), each.**

(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~~, **identified as Line 1**, shall be limited as follows:

- (1) The total VOC input to ~~P1 Fab~~**Line 1**, 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 **to Line 1**.

~~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.~~

D.1.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each Thermocycler shall be limited to 0.6 pounds per MMBtu heat input.

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

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

Compliance with the VOC usage limitations for ~~P1 Fab~~**Line 1** shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** 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 **the compliance status** 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, **and each compliance period.**
- (b) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit~~ **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

D.1.5 Reporting Requirement

...

Section D.2 - Revisions

- (a) IDEM added a new Condition D.2.2 - Particulate Emissions Limitation to incorporate applicable requirements for sources of indirect heating.
- (b) IDEM, OAQ updated Condition D.2.4 - Volatile Organic Compounds to current model language.
- (c) IDEM, OAQ updated Condition D.2.5 - Record Keeping Requirement to current model language.
- (d) Section D.2 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Section D.2 has been revised as follows:

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 2

- (a) One (1) fabrication facility, identified as ~~P2 Fab, approved~~ **Line 2, constructed** 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~~ **Line 2 Final Finish**, ~~approved~~ **constructed** 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~~ **Line 2 Assembly**, ~~approved~~ **constructed** 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 outdoors, and consisting of:**
 - (1) **Three (3) natural gas-fired radiant tube heaters, identified as H7-H9, each rated at 0.120 million British thermal units per hour (MMBtu/hr);**
 - (2) **Two (2) natural gas-fired radiant tube heaters, identified as H11 and H12, each rated at 0.080 million British thermal units per hour (MMBtu/hr); and**
 - (3) **One (1) natural gas-fired Thermocycler, identified as H6, rated at 0.464 million British thermal units per hour (MMBtu/hr).**

(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~~, **identified as Line 2**, shall be limited as follows:

- (1) The total VOC input to ~~P2 Fab~~**Line 2**, 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~~**Line 2** and shall render the requirements of 326 IAC 8-1-6 not applicable **to Line 2**.

~~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.~~

D.2.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
Radiant tube heaters	H7 - H9	0.6
Radiant tube heaters	H11 - H12	0.6
Thermocycler	H6	0.6

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

D.2.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations for ~~P2 Fab~~**Line 2** shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** 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 **the** compliance **status** 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) Total VOC usage for each month, **and each compliance period.**
- (b) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit~~ **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

D.2.5 Reporting Requirement

...

Section D.3 - Addition

A new Section D.3 is added to incorporate requirements for the new Line 3.

Section D.3 has been added as follows:

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

- (g) One (1) fabrication facility, identified as Line 3, with a nominal capacity of 4.0 recreational travel trailers per hour, consisting of the following operations:
 - (1) One (1) final finish operation, identified as Line 3 Final Finish, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings.
 - (2) One (1) assembly operation, identified as Line 3 Assembly, approved in 2016 for construction, utilizing no control, exhausting within the building, and consisting of hand application of coatings and use of hand-held aerosol canisters.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting outdoors, and consisting of:
 - (1) Four (4) natural gas-fired Thermocyclers, identified as H17-H20, approved in 2016 for construction, with a maximum heat input capacity of 0.55 million British

(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.3.1 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 VOC input to the fabrication facility, identified as Line 3,

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 Line 3 and shall render the requirements of 326 IAC 8-1-6 not applicable to Line 3.

D.3.2 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each Thermocycler shall be limited to 0.6 pounds per MMBtu heat input.

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

D.3.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

D.3.4 Record Keeping Requirement

(a) To document the compliance status with Condition D.3.1, 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.3.1. 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 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 and each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.3.5 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.3.1 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).

Reporting Forms - Revisions

- (a) A new FESOP Quarterly Report Form is added for the reporting requirement for Line 3.
- (b) Reporting forms have been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

Reporting Forms have been revised as follows:

**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~~ **Line 1**
Pollutant: VOC
Limit: The total VOC input to ~~P1 Fab~~ **Line 1, 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.

QUARTER: _____ YEAR: _____

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

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~~**Line 2**
Pollutant: VOC
Limit: The total VOC input to ~~P2-Fab~~**Line 2, 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.

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: Line 3
Pollutant: VOC
Limit: The VOC input to the fabrication facility, identified as Line 3, 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.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

...

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:

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Lamination	-	-	-	-	-	3.83E-07	-	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	-	-	26.38	-	3.36
Line 1 Final Finish	-	-	-	-	-	0.17	-	9.88E-05
Line 2 Assembly	0.47	0.47	0.47	-	-	26.38	-	3.36
Line 2 Final Finish	-	-	-	-	-	0.17	-	9.88E-05
Line 3 Assembly	0.38	0.38	0.38	-	-	43.46	-	4.14
Line 3 Final Finish	-	-	-	-	-	0.29	-	7.90E-04
Line 1 Woodworking & Material Cutting (WW-1 & MC-1)	1.48	1.48	1.48	-	-	-	-	-
Line 2 Woodworking (WW-2)	1.60	1.60	1.60	-	-	-	-	-
Welding	3.32E-02	3.32E-02	3.32E-02	-	-	-	-	2.05E-03
Natural Gas Combustion	6.38E-02	0.26	0.26	2.02E-02	3.36	0.18	2.82	6.34E-02
Unpaved Roads	0.16	3.96E-02	3.96E-03	-	-	-	-	-
Paved Roads	0.21	4.19E-02	1.03E-02	-	-	-	-	-
Total	4.87	4.78	4.71	2.02E-02	3.36	97.03	2.82	10.93

* PM2.5 listed is direct PM2.5

Potential to Emit After Issuance (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Lamination	-	-	-	-	-	< 25	-	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	-	-		-	3.36
Line 1 Final Finish	-	-	-	-	-		-	9.88E-05
Line 2 Assembly	0.47	0.47	0.47	-	-	< 25	-	3.36
Line 2 Final Finish	-	-	-	-	-		-	9.88E-05
Line 3 Assembly	0.38	0.38	0.38	-	-	< 25	-	4.14
Line 3 Final Finish	-	-	-	-	-		-	7.90E-04
Line 1 Woodworking	1.48	1.48	1.48	-	-	-	-	-
Line 2 Woodworking	1.60	1.60	1.60	-	-	-	-	-
Welding	0.03	0.03	0.03	-	-	-	-	2.05E-03
Natural Gas Combustion	6.38E-02	0.26	0.26	2.02E-02	3.36	0.18	2.82	6.34E-02
Unpaved Roads	0.16	3.96E-02	3.96E-03	-	-	-	-	-
Paved Roads	0.21	4.19E-02	1.03E-02	-	-	-	-	-
Total	4.87	4.78	4.71	2.02E-02	3.36	75.18	2.82	10.93

* PM2.5 listed is direct PM2.5

**Appendix A: Emission Calculations
HAP Summary**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Uncontrolled Potential to Emit (tons/yr)										
Emission Unit	Lamination	Line 1 Assembly	Line 1 Final Finish	Line 2 Assembly	Line 2 Final Finish	L3 Assembly	L3 Final Finish	Welding	NG Combustion	Total HAP
Organic HAPs										
Benzene	-	-	-	-	-	-	-	-	7.06E-05	7.06E-05
Dichlorobenzene	-	-	-	-	-	-	-	-	4.03E-05	4.03E-05
Ethylbenzene	-	-	3.66E-06	-	3.66E-06	-	2.93E-05	-	-	3.66E-05
Formaldehyde	-	-	3.47E-07	-	3.47E-07	-	2.78E-06	-	2.52E-03	2.52E-03
n-Hexane	-	0.52	-	0.52	-	1.03	-	-	6.05E-02	2.13
MDI	3.83E-07	0.93	-	0.93	-	1.49	-	-	-	3.36
Methanol	-	3.83E-03	-	3.83E-03	-	7.67E-03	-	-	-	1.53E-02
Methylene chloride	-	0.89	-	0.89	-	-	-	-	-	1.77
Perchloroethylene	-	0.76	-	0.76	-	1.20	-	-	-	2.73
Toluene	-	-	5.82E-05	-	5.82E-05	-	4.66E-04	-	1.14E-04	6.97E-04
Xylenes	-	0.26	3.66E-05	0.26	3.66E-05	0.40	2.93E-04	-	-	0.91
Inorganic HAPs										
Cadmium	-	-	-	-	-	-	-	-	3.70E-05	3.70E-05
Chromium	-	-	-	-	-	-	-	6.39E-06	4.70E-05	5.34E-05
Cobalt	-	-	-	-	-	-	-	6.39E-06	-	6.39E-06
Lead	-	-	-	-	-	-	-	-	1.68E-05	1.68E-05
Manganese	-	-	-	-	-	-	-	2.03E-03	1.28E-05	2.04E-03
Nickel	-	-	-	-	-	-	-	6.39E-06	7.06E-05	7.69E-05
Total Emissions	3.83E-07	3.36	9.88E-05	3.36	9.88E-05	4.14	7.90E-04	2.05E-03	6.34E-02	10.93

**Appendix A: Emission Calculations
SPR Summary**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Uncontrolled Potential to Emit of Modified Units Before this Revision ¹ (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO2	NOx	VOC	CO	Total HAPs
Lamination	0	0	0	-	-	negl	-	negl
P1 Assembly	0	0	0	-	-	26.37	-	5.54
P2 Assembly	0	0	0	-	-	26.37	-	5.54
Paved Roads	0.13	2.62E-02	6.43E-03	-	-	-	-	-
Total	0.13	2.62E-02	6.43E-03	-	-	52.75	-	11.08

Uncontrolled Potential to Emit of Modified Units After this Revision (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO2	NOx	VOC	CO	Total HAPs
Lamination	-	-	-	-	-	3.83E-07	-	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	-	-	26.38	-	3.36
Line 2 Assembly	0.47	0.47	0.47	-	-	26.38	-	3.36
Paved Roads	0.21	4.19E-02	1.03E-02	-	-	-	-	-
Total	1.16	0.99	0.96	-	-	52.75	-	6.73

Increased Potential to Emit of the Modified Units ³ (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO2	NOx	VOC	CO	Total HAPs
Lamination	-	-	-	-	-	3.83E-07	-	3.83E-07
Line 1 Assembly	0.47	0.47	0.47	-	-	1.83E-03	-	0
Line 2 Assembly	0.47	0.47	0.47	-	-	1.83E-03	-	0
Paved Roads	7.86E-02	1.57E-02	3.86E-03	-	-	-	-	-
Total	1.03	0.96	0.95	-	-	3.66E-03	-	3.83E-07

Uncontrolled Potential to Emit of the New Units (tons/year)								
Emission Unit	PM	PM10	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs
Line 3 Assembly	0.38	0.38	0.38	-	-	43.46	-	4.14
Line 3 Final Finish	-	-	-	-	-	0.29	-	7.90E-04
Welding (Line 3)	9.96E-03	9.96E-03	9.96E-03	-	-	-	-	6.15E-04
Natural Gas Combustion (Lamination, Line 3)	3.69E-02	0.15	0.15	1.16E-02	1.94	0.11	1.63	3.66E-02
Total	0.43	0.54	0.54	1.16E-02	1.94	43.86	1.63	4.18

Uncontrolled Potential to Emit of This Revision (tons/year)								
	PM	PM10	PM2.5 ²	SO2	NOx	VOC	CO	Total HAPs
Increased PTE of the Modified Units	1.03	0.96	0.95	-	-	3.66E-03	-	3.83E-07
PTE of the New Units	0.43	0.54	0.54	1.16E-02	1.94	43.86	1.63	4.18
Total PTE of this Revision	1.45	1.50	1.49	1.16E-02	1.94	43.86	1.63	4.18

Notes:

1. Source: TSD App A, MSOP 087-34865-00679, issued on February 20, 2015, P1 and P2 Assembly each shown as half of the total.
2. PM2.5 listed is direct PM2.5
3. Greater of 0 or [PTE After - PTE Before]

**Appendix: Emissions Calculations
Potential VOC, HAP, and Particulate Emissions
from Surface Coating Operations
P1 Lamination and P2 Lamination**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Total PTE VOC : Lamination		Density (Lb/Gal)	Weight % Volatile (H ₂ O & 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 ¹ (lb/hr)	PTE VOC ⁽²⁾ (ton/yr)	PTE PM/PM ₁₀ /PM _{2.5} (ton/yr)	lb VOC/gal solids	Transfer Efficiency (See Note Below)	Substrate
Line 1 and Line 2																	
Laminator 1	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	0.286	1.00	1.00	1.00	8.74E-09	3.83E-08	0	1.12	100%	Plastic/Wood
Laminator 2	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	0.286	1.00	1.00	1.00	8.74E-09	3.83E-08	0	1.12	100%	Plastic/Wood
Line 1 and Line 2 Total												1.75E-08	7.65E-08	0			
Line 3																	
Laminator 1	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	0.286	4.00	1.00	1.00	3.49E-08	1.53E-07	0	1.12	100%	Plastic/Wood
Laminator 2	Forbo Adhesives	10.01	10.00%	0.00%	10.00%	0.00%	89.00%	0.286	4.00	1.00	1.00	3.49E-08	1.53E-07	0	1.12	100%	Plastic/Wood
Line 3 Total												6.99E-08	3.06E-07	0			
Uncontrolled Potential VOC Emissions												8.74E-08	3.83E-07	0			

Total PTE HAP: Lamination		Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight %MDI ²	MDI Emissions ³ (lb/hr)	Total HAP Emissions (ton/yr)
Line 1 and Line 2							
Laminator 1	Forbo Adhesives	10.01	0.286	1.00	10.00%	8.74E-09	3.83E-08
Laminator 2	Forbo Adhesives	10.01	0.286	1.00	10.00%	8.74E-09	3.83E-08
Line 1 and Line 2 Total							7.65E-08
Line 3							
Laminator 1	Forbo Adhesives	10.01	0.286	4.00	10.00%	3.49E-08	1.53E-07
Laminator 2	Forbo Adhesives	10.01	0.286	4.00	10.00%	3.49E-08	1.53E-07
Line 3 Total							3.06E-07
Uncontrolled Potential HAP Emissions							3.83E-07

Notes:

1. Because the VOC component is a highly reactive compound and the coating is enclosed between layers of material, VOC emissions are considered equal to HAP emissions
2. MDI = Methylene diphenyl diisocyanate, CAS No. 9016-87-9
3. Calculated MDI/HAP emissions based on Center for the Polyurethanes Industry methodology cited below.

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: Emissions Calculations
Potential VOC, HAP, and Particulate Emissions
from Surface Coating Operations
P1 Lamination and P2 Lamination

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

METHODOLOGY

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, 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;

Appendix D, Equation 7.0, Calculating Emissions From Open Processes

$$W = 25.4 * VP_{MDI} * (M_W / T_{PROC}) * u^{0.78} * S_A * t_{TF} * K_{MDI}$$

Where W = Evaporative Losses, g/day

VP_{MDI} = MDI Vapor Pressure at process temperature, atm

= 1.023E-05 mm Hg, Table A-1

= 1.346E-08 atm

M_W = Molecular Weight

= 250.26 g/g-mole

T_{PROC} = Process Temperature (Kelvin)

= 77 °F (ambient conditions)

= 298 K

u = Airflow speed, m/s

= 100 ft/min (assumed worst case for the work area)

= 0.51 m/s

S_A = Exposed Surface Area, m²/day (worst case)

32.5 ft L x 8 ft H = 260 ft²/unit

Line 1 & Line 2 Line 3

each laminator each laminator

1 4 unit/hr

260 1040 ft²/hr

= 6,240 24,960 ft²/day

S_A = 580 2,319 m²/day

t_{TF} = Tack Free Time, sec

= 5.00 sec (default value)

K_{MDI} = Vapor Pressure Adjustment Factor for Polyisocyanate Concentration

= 0.19 interpolated from Table B-1, 10% MDI, 77°F

Line 1 & Line 2 Line 3

each laminator each laminator

Then W = 9.51E-05 3.80E-04 g/day

= 3.96E-06 1.58E-05 g/hr

PTE = 8.74E-09 3.49E-08 lb/hr

METHODOLOGY REFERENCE

MDI Emissions Reporting Guidelines for the Polyurethanes Industry, American Chemistry Council, Center for the Polyurethanes Industry, Washington, DC, May 2012

**Appendix A: Emissions Calculations
Potential VOC, HAPs, and Particulate Emissions
from Surface Coating Operations
Line 1 and Line 2 Assembly**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

1. VOC and PM/PM10/PM2.5

Line 1

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)	Gallons of Coating per Day (gal/day)	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	Application Method ¹	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	0.50	8.35	0.41	0.39	0.14	3.29	0.60	0	0.44	manual	100%	Metal/Plastic
Assembly	Geocel	Color Match	Gen Purpose	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.1898	0.50	2.28	0.41	0.39	3.74E-02	0.90	0.16	0	0.44	manual	100%	Metal/Plastic
Assembly	Geocel	8100	Acetox Cure GP	8.01	3.00%	0.00%	3.00%	0.00%	96.74%	0.1875	0.50	2.25	0.24	0.24	2.25E-02	0.54	0.10	0	0.25	manual	100%	Metal/Plastic
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	2.50%	0.00%	2.50%	0.00%	97.05%	0.1580	0.50	1.90	0.22	0.22	1.71E-02	0.41	7.51E-02	0	0.22	manual	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	0.50	1.19	0.24	0.24	1.19E-02	0.29	5.21E-02	0	0.25	manual	100%	Wood/Fabric
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	46.42%	0.00%	46.42%	0.00%	59.63%	1.4990	0.50	17.99	2.97	2.97	2.23	53.44	9.75	0	4.98	manual	100%	Wood/Fabric
Assembly	Hahn Systems	24B	Foam Sealant	9.18	24.00%	0.00%	24.00%	0.00%	70.07%	0.8152	0.50	9.78	2.20	2.20	0.90	21.55	3.93	0	3.14	manual	100%	Wood/Fabric
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	56.20%	1.2499	0.50	15.00	3.03	2.93	1.83	43.89	8.01	0	5.21	manual	100%	Wood/Fabric
Assembly	StaPut	SP90	StaPut Big Sticky ²	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	0.2990	0.50	3.59	3.25	2.59	0.39	9.29	1.70	0	6.18	nonatomize d spray	100%	Wood/Fabric
Assembly	StaPut	SP80	StaPut Aerosol Adhesive ^{3,4}	7.89	0.26%	0.00%	0.26%	0.00%	99.72%	0.0443	0.50	0.53	2.05E-02	2.05E-02	4.54E-04	1.09E-02	1.99E-03	0.19	2.06E-02	HVLP	75%	Wood/Fabric
Assembly	Oatey	60E5	ABS Adhesive	7.34	75.00%	30.00%	45.00%	26.40%	25.20%	0.2564	0.50	3.08	4.49	3.30	0.42	10.16	1.85	0	13.11	manual	100%	Plastic
Assembly	Premier	PB 925	Adhesive ⁵	9.69	10.84%	0.00%	10.84%	0.00%	85.73%	0.0597	0.50	0.72	1.05	1.05	3.14E-02	0.75	0.14	0.28	1.23	HVLP	75%	Plastic
Total Uncontrolled Potential VOC Emissions				Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										1.25	gal/day	6.02	144.53	26.38	0.47			

Line 2

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)	Gallons of Coating per Day (gal/day)	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	Application Method ¹	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	0.50	8.35	0.41	0.39	0.14	3.29	0.60	0	0.44	manual	100%	Metal/Plastic
Assembly	Geocel	Color Match	Gen Purpose	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.1898	0.50	2.28	0.41	0.39	3.74E-02	0.90	0.16	0	0.44	manual	100%	Metal/Plastic
Assembly	Geocel	8100	Acetox Cure GP	8.01	3.00%	0.00%	3.00%	0.00%	96.74%	0.1875	0.50	2.25	0.24	0.24	2.25E-02	0.54	0.10	0	0.25	manual	100%	Metal/Plastic
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	2.50%	0.00%	2.50%	0.00%	97.05%	0.1580	0.50	1.90	0.22	0.22	1.71E-02	0.41	7.51E-02	0	0.22	manual	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	0.50	1.19	0.24	0.24	1.19E-02	0.29	5.21E-02	0	0.25	manual	100%	Wood/Fabric
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	46.42%	0.00%	46.42%	0.00%	59.63%	1.4990	0.50	17.99	2.97	2.97	2.23	53.44	9.75	0	4.98	manual	100%	Wood/Fabric
Assembly	Hahn Systems	24B	Foam Sealant	9.18	24.00%	0.00%	24.00%	0.00%	70.07%	0.8152	0.50	9.78	2.20	2.20	0.90	21.55	3.93	0	3.14	manual	100%	Wood/Fabric
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	56.20%	1.2499	0.50	15.00	3.03	2.93	1.83	43.89	8.01	0	5.21	manual	100%	Wood/Fabric
Assembly	StaPut	SP90	StaPut Big Sticky ²	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	0.2990	0.50	3.59	3.25	2.59	0.39	9.29	1.70	0	6.18	nonatomize d spray	100%	Wood/Fabric
Assembly	StaPut	SP80	StaPut Aerosol Adhesive ^{3,4}	7.89	0.26%	0.00%	0.26%	0.00%	99.72%	0.0443	0.50	0.53	2.05E-02	2.05E-02	4.54E-04	1.09E-02	1.99E-03	0.19	2.06E-02	HVLP	75%	Wood/Fabric
Assembly	Oatey	60E5	ABS Adhesive	7.34	75.00%	30.00%	45.00%	26.40%	25.20%	0.2564	0.50	3.08	4.49	3.30	0.42	10.16	1.85	0	13.11	manual	100%	Plastic
Assembly	Premier	PB 925	Adhesive ⁵	9.69	10.84%	0.00%	10.84%	0.00%	85.73%	0.0597	0.50	0.72	1.05	1.05	3.14E-02	0.75	0.14	0.28	1.23	HVLP	75%	Plastic
Total Uncontrolled Potential VOC Emissions				Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)										1.25	gal/day	6.02	144.53	26.38	0.47			

Notes:

- Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
- IDEM, OAQ has determined that application of SP90 Big Sticky adhesive in RV assembly operations at this source when using non-atomizing spray guns does not generate particulate emissions.
- Weight % Volatile value is based on Method 24 VOC content from SDS.
- IDEM cannot confirm that these products use non-atomizing spray, so the worst-case PTE is based on typical HVLP spray.

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 hr/yr) * (1 ton/2000 lbs)
PTE PM/PM10 (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

**Appendix A: Emissions Calculations
Potential VOC, HAPs, and Particulate Emissions
from Surface Coating Operations
Line 1 and Line 2 Assembly**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

2. HAZARDOUS AIR POLLUTANTS

Line 1

Process	Manufacturer	Product Number	Description	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (units/hr)	Weight % Hexane	Weight % MDI ¹	Weight % Methanol	Weight % Perc ²	Weight % MC ³	Weight % Xylene	Hexane Emissions (ton/yr)	MDI Emissions ⁴ (ton/yr)	Methanol Emissions (ton/yr)	TCE Emissions (ton/yr)	MC Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Geocel	2300	Gen Purpose	9.85	0.70	0.50	0%	0%	0%	4.00%	0%	1.34%	0	0	0	0.60	0	0.20	0.80
Assembly	Geocel	Color Match	Gen Purpose	9.85	0.19	0.50	0%	0%	0%	4.00%	0%	1.34%	0	0	0	0.16	0	5.49E-02	0.22
Assembly	Geocel	8100	Acetoxy Cure GP	8.01	0.19	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	0.16	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	9.90E-02	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	1.50	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Hahn Systems	24B	Foam Sealant	9.18	0.82	0.50	0%	19.00%	0%	0%	0%	0%	0	0.93	0	0	0	0	0.93
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	1.25	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	StaPut	SP90	StaPut Big Sticky	6.08	0.30	0.50	13.00%	0%	0%	0%	0%	0%	0.52	0	0	0	0	0	0.52
Assembly	StaPut	SP80	StaPut Aerosol Adhesive	7.89	0.04	0.50	0%	0%	0.50%	0%	0%	0%	0	0	3.83E-03	0	0	0	3.83E-03
Assembly	Oatey	60E5	ABS Adhesive	7.34	0.26	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Premier	PB 925	Adhesive	9.69	5.97E-02	0.50	0%	0%	0%	0%	70.00%	0%	0	0	0	0	0.89	0	0.89
Total Uncontrolled Potential HAP Emissions													0.52	0.93	3.83E-03	0.76	0.89	0.26	3.36

Line 2

Process	Manufacturer	Product Number	Description	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (units/hr)	Weight % Hexane	Weight % MDI ¹	Weight % Methanol	Weight % Perc ²	Weight % MC ³	Weight % Xylene	Hexane Emissions (ton/yr)	MDI Emissions ⁴ (ton/yr)	Methanol Emissions (ton/yr)	TCE Emissions (ton/yr)	MC Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Geocel	2300	Gen Purpose	9.85	0.70	0.50	0%	0%	0%	4.00%	0%	1.34%	0	0	0	0.60	0	0.20	0.80
Assembly	Geocel	Color Match	Gen Purpose	9.85	0.19	0.50	0%	0%	0%	4.00%	0%	1.34%	0	0	0	0.16	0	5.49E-02	0.22
Assembly	Geocel	8100	Acetoxy Cure GP	8.01	0.19	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	0.16	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	9.90E-02	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	1.50	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Hahn Systems	24B	Foam Sealant	9.18	0.82	0.50	0%	19.00%	0%	0%	0%	0%	0	0.93	0	0	0	0	0.93
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	1.25	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	StaPut	SP90	StaPut Big Sticky	6.08	0.30	0.50	13.00%	0%	0%	0%	0%	0%	0.52	0	0	0	0	0	0.52
Assembly	StaPut	SP80	StaPut Aerosol Adhesive	7.89	0.04	0.50	0%	0%	0.50%	0%	0%	0%	0	0	3.83E-03	0	0	0	3.83E-03
Assembly	Oatey	60E5	ABS Adhesive	7.34	0.26	0.50	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0
Assembly	Premier	PB 925	Adhesive	9.69	5.97E-02	0.50	0%	0%	0%	0%	70.00%	0%	0	0	0	0	0.89	0	0.89
Total Uncontrolled Potential HAP Emissions													0.52	0.93	3.83E-03	0.76	0.89	0.26	3.36

Notes

- MDI - Methylene diphenyl diisocyanate, CAS No. 9016-87-9
- Perc - perchloroethylene (tetrachloroethene)
- MC - methylene chloride (dichloromethane)
- The source did not provide information required to calculate the Assembly MDI emissions using industry guidance. However, in par. 1.1, Appendix A to Subpart P of Part 63, U.S. EPA notes that with regard to reactive adhesives "At least 70 weight percent of the system, excluding water and non-volatile solids such as fillers, react during the process." Therefore the MDI content of polyurethane products was multiplied by 0.3 to determine the worst case PTE.

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
Line 1 and Line 2 Final Finish**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

1. VOC and PM/PM10/PM2.5

Line 1

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)	Gallons of Coating per Day (gal/day)	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	Application Method ¹	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%	1.15E-04	0.50	1.38E-03	0.15	0.15	8.51E-06	2.04E-04	3.73E-05	0	8.70	manual (wipe)	100%	Metal/Plastic	
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	2.30E-04	0.50	2.76E-03	7.93	5.08	5.84E-04	1.40E-02	2.56E-03	0	18.15	manual (wipe)	100%	Metal/Plastic	
Final Finish	TCI	Acetone	Cleaner	Acetone	6.59	100.00%	100.00%	0%	100.00%	100.00%	2.30E-03	0.50	2.76E-02	0	0	0	0	0	0	0	0	manual (wipe)	100%	Solvent/Cleaner
Final Finish	TCI	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	100.00%	0%	100.00%	0%	0%	9.20E-03	0.50	0.11	6.59	6.59	3.03E-02	0.73	0.13	0	0	0	100%	Solvent/Cleaner	
Final Finish	TCI	Mineral Spirits	Cleaner	Mineral Spirits	6.59	100.00%	0%	100.00%	0%	0%	1.15E-02	0.50	0.14	6.59	6.59	3.79E-02	0.91	0.17	0	0	0	100%	Solvent/Cleaner	

Potential to Emit													Atomized spray	0	gal/day	0.04	0.92	0.17	0.00
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Line 2

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)	Gallons of Coating per Day (gal/day)	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	Application Method ¹	Transfer Efficiency (See Note Below)	Substrate	
Final Finish	US Polychemical	224704	Cleaner	Aqueous Cleaner	8.60	100.00%	98.28%	1.72%	0%	1.70%	1.15E-04	0.50	1.38E-03	0.15	0.15	8.51E-06	2.04E-04	3.73E-05	0	8.70	manual (wipe)	100%	Metal/Plastic	
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	2.30E-04	0.50	2.76E-03	7.93	5.08	5.84E-04	1.40E-02	2.56E-03	0	18.15	manual (wipe)	100%	Metal/Plastic	
Final Finish	TCI	Acetone	Cleaner	Acetone	6.59	100.00%	100.00%	0%	100.00%	100.00%	2.30E-03	0.50	2.76E-02	0	0	0	0	0	0	0	0	manual (wipe)	100%	Solvent/Cleaner
Final Finish	TCI	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	100.00%	0%	100.00%	0%	0%	9.20E-03	0.50	0.11	6.59	6.59	3.03E-02	0.73	0.13	0	0	0	100%	Solvent/Cleaner	
Final Finish	TCI	Mineral Spirits	Cleaner	Mineral Spirits	6.59	100.00%	0%	100.00%	0%	0%	1.15E-02	0.50	0.14	6.59	6.59	3.79E-02	0.91	0.17	0	0	0	100%	Solvent/Cleaner	

Potential to Emit													Atomized spray	0	gal/day	0.04	0.92	0.17	0
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Notes:
1. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings

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

**Appendix A: Emissions Calculations
Potential VOC, HAPs, and Particulate Emissions
from Surface Coating Operations
Line 1 and Line 2 Final Finish**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

2. Hazardous Air Pollutants

Line 1

Process	Process	Manufacturer	Use	Description	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (units/hr)	Weight % EB ¹	Weight % Formaldehyde	Weight % Toluene	Weight % Xylene	EB 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	0.50	0%	0%	1.00%	0%	-	-	2.17E-05	-	2.17E-05
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	2.30E-04	0.50	0.10%	0.01%	1.00%	1.00%	3.66E-06	3.47E-07	3.66E-05	3.66E-05	7.71E-05
Final Finish	TCl	Acetone	Cleaner	Acetone	6.59	2.30E-03	0.50	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCl	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	9.20E-03	0.50	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCl	Mineral Spirits	Cleaner	Mineral Spirits	6.59	1.15E-02	0.50	0%	0%	0%	0%	-	-	-	-	-

Uncontrolled Potential Emissions	3.66E-06	3.47E-07	5.82E-05	3.66E-05	9.88E-05
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Line 2

Process	Process	Manufacturer	Use	Description	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (units/hr)	Weight % EB ¹	Weight % Formaldehyde	Weight % Toluene	Weight % Xylene	EB 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	0.50	0%	0%	1.00%	0%	-	-	2.17E-05	-	2.17E-05
Final Finish	PPG	175438	Cleaner	Lacquer Thinner	7.26	2.30E-04	0.50	0.10%	0.01%	1.00%	1.00%	3.66E-06	3.47E-07	3.66E-05	3.66E-05	7.71E-05
Final Finish	TCl	Acetone	Cleaner	Acetone	6.59	2.30E-03	0.50	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCl	Isopropanol	Cleaner	Alcohol - Isopropyl	6.59	9.20E-03	0.50	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCl	Mineral Spirits	Cleaner	Mineral Spirits	6.59	1.15E-02	0.50	0%	0%	0%	0%	-	-	-	-	-

Uncontrolled Potential Emissions	3.66E-06	3.47E-07	5.82E-05	3.66E-05	9.88E-05
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Notes:
1. EB - ethylbenzene

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
Line 3 Assembly**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

1. VOC and PM/PM10/PM2.5

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)	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/P M2.5 (ton/yr)	lb VOC/gal solids	Application Method ¹	Transfer Efficiency (See Note Below)	Substrate	
Assembly	Geocel	2300	Gen Purpose	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.17	4.00	16.70	0.41	0.39	0.27	6.58	1.20	0	0.44	Manual	100%	Metal/Plastic	
Assembly	Geocel	8100	Acetox Cure GP	8.01	3.00%	0.00%	3.00%	0.00%	96.74%	4.68E-02	4.00	4.49	0.24	0.24	0.04	1.08	0.20	0	0.25	Manual	100%	Metal/Plastic	
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	2.50%	0.00%	2.50%	0.00%	97.05%	3.95E-02	4.00	3.79	0.22	0.22	0.03	0.82	0.15	0	0.22	Manual	100%	Wood/Fabric	
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	3.00%	0.00%	3.00%	0.00%	96.73%	2.47E-02	4.00	2.37	0.24	0.24	0.02	0.57	0.10	0	0.25	Manual	100%	Wood/Fabric	
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	46.42%	0.00%	46.42%	0.00%	59.63%	0.30	4.00	28.78	2.97	2.97	3.56	85.50	15.60	0	4.98	Manual	100%	Wood/Fabric	
Assembly	Hahn Systems	24B	Foam Sealant	9.18	24.00%	0.00%	24.00%	0.00%	70.07%	0.16	4.00	15.65	2.20	2.20	1.44	34.48	6.29	0	3.14	Manual	100%	Wood/Fabric	
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	56.20%	0.25	4.00	23.99	3.03	2.93	2.93	70.21	12.81	0	5.21	Manual	100%	Wood/Fabric	
Assembly	StaPut	SP90	StaPut Big Sticky ²	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	7.47E-02	4.00	7.17	3.25	2.59	0.77	18.57	3.39	0	6.18	nonatomize d spray	100%	Wood/Fabric	
Assembly	StaPut	SP80	StaPut Aerosol Adhesive ^{3,4}	7.89	0.26%	0.00%	0.26%	0.00%	99.72%	1.11E-02	4.00	1.07	2.05E-02	2.05E-02	9.11E-04	2.19E-02	3.99E-03	0.38	2.06E-02	HVLP	75%	Wood/Fabric	
Assembly	Oatey	60E5	ABS Adhesive	7.34	75.00%	30.00%	45.00%	26.40%	25.20%	6.41E-02	4.00	6.15	4.49	3.30	0.85	20.33	3.71	0	13.11	Manual	100%	Plastic	
Total Uncontrolled Potential VOC Emissions				Coatings not otherwise exempted under 326 IAC 6-3-1(b)(5)-(8)								1.07	gal/day	9.92	238.16	43.46	0.38						

- Notes:
- Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings
 - IDEM, OAG has determined that application of SP90 Big Sticky adhesive in RV assembly operations at this source when using non-atomizing spray guns does not generate particulate emissions.
 - Weight % Volatile value is based on Method 24 VOC content from SDS.
 - IDEM cannot confirm that these products use non-atomizing spray, so the worst-case PTE is based on typical HVLP spray.

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) * (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

2. Hazardous Air Pollutants

Process	Manufacturer	Product Number	Description	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (units/hr)	Weight % Hexane	Weight % MDI ¹	Weight % Methanol	Weight % Perc ²	Weight % Xylene	Hexane Emissions (ton/yr)	MDI Emissions ³ (ton/yr)	Methanol Emissions (ton/yr)	TCE Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Geocel	2300	Gen Purpose	9.85	0.17	4.00	0%	0%	0%	4.00%	1.34%	0	0	0	1.20	0.40	1.60
Assembly	Geocel	8100	Acetox Cure GP	8.01	4.68E-02	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Assembly	Sil-Bond	RTV 4500	Silicone Sealant	8.68	3.95E-02	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Assembly	American Sealants	504	Multi Purpose Silicone Sealant	8.01	2.47E-02	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Assembly	3M	EXP 90	Adhesive/Sealant	6.40	0.30	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Assembly	Hahn Systems	24B	Foam Sealant	9.18	0.16	4.00	0%	19.00%	0%	0%	0%	0	1.49	0	0	0	1.49
Assembly	Dicor	502 LSW	Adhesive/Sealant	9.92	0.25	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Assembly	StaPut	SP90	StaPut Big Sticky	6.08	7.47E-02	4.00	13.00%	0%	0%	0%	0%	1.03	0	0	0	0	1.03
Assembly	StaPut	SP80	StaPut Aerosol Adhesive	7.89	1.11E-02	4.00	0%	0%	0.50%	0%	0%	0	0	7.67E-03	0	0	7.67E-03
Assembly	Oatey	60E5	ABS Adhesive	7.34	6.41E-02	4.00	0%	0%	0%	0%	0%	0	0	0	0	0	0
Total Uncontrolled Potential HAP Emissions												1.03	1.49	7.67E-03	1.20	0.40	4.14

- Notes
- MDI - Methylene diphenyl diisocyanate, CAS No. 9016-87-9
 - Perc - perchloroethylene (tetrachloroethene)
 - The source did not provide information required to calculate the Assembly MDI emissions using industry guidance. However, in par. 1.1, Appendix A to Subpart P of Part 63, U.S. EPA notes that with regard to reactive adhesives "At least 70 weight percent of the system, excluding water and non-volatile solids such as fillers, react during the process." Therefore the MDI content of polyurethane products was multiplied by 0.3 to determine the worst case PTE.

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
Line 3 Final Finish**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

1. VOC and PM/PM10/PM2.5

Process	Manufacturer	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)	Gallons of Coating per Day (gal/day)	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	Application Method ¹	Transfer Efficiency (See Note Below)	Substrate
Final Finish	US Polychemical	Aqueous Cleaner	8.60	100.00%	98.28%	1.72%	0.00%	1.70%	1.15E-04	4.00	1.10E-02	0.15	0.15	6.80E-05	1.63E-03	2.98E-04	0	8.70	manual (wipe)	100%	Metal/Plastic
Final Finish	PPG	Lacquer Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	2.30E-04	4.00	2.21E-02	7.93	5.08	4.68E-03	0.11	2.05E-02	0	18.15	manual (wipe)	100%	Metal/Plastic
Final Finish	TCI	Acetone	6.59	100.00%	100.00%	0.00%	100.00%	100.00%	4.00E-04	4.00	3.84E-02	0	0	0	0	0	0	0	manual (wipe)	100%	Solvent/Cleaner
Final Finish	TCI	Alcohol - Isopropyl	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	1.80E-03	4.00	0.17	6.59	6.59	4.74E-02	1.14	0.21	0	0	manual (wipe)	100%	Solvent/Cleaner
Final Finish	TCI	Mineral Spirits	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	2.30E-03	4.00	0.22	6.59	6.59	6.06E-02	1.46	0.27	0	0	manual (wipe)	100%	Solvent/Cleaner
Potential to Emit													6.53E-02	1.57	0.29	0					

Notes:

1. Manual application methods include dip, roll, flow (including tube and caulking gun-type applications), brush, and wipe coatings

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) = (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

2. Hazardous Air Pollutants

Process	Manufacturer	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	Aqueous Cleaner	8.60	1.15E-04	4.00	0%	0%	1.00%	0%	-	-	1.73E-04	-	1.73E-04
Final Finish	PPG	Lacquer Thinner	7.26	2.30E-04	4.00	0.10%	0.01%	1.00%	1.00%	2.93E-05	2.78E-06	2.93E-04	2.93E-04	6.17E-04
Final Finish	TCI	Acetone	6.59	4.00E-04	4.00	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCI	Alcohol - Isopropyl	6.59	1.80E-03	4.00	0%	0%	0%	0%	-	-	-	-	-
Final Finish	TCI	Mineral Spirits	6.59	2.30E-03	4.00	0%	0%	0%	0%	-	-	-	-	-
Uncontrolled Potential Emissions										2.93E-05	2.78E-06	4.66E-04	2.93E-04	7.90E-04

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
Process Particulate Emissions
Particulate Emissions from Line 1 Material Cutting (MC-1) and Woodworking Operation (WW-1)

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Material Cutting (MC-1)

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							

Woodworking (WW1)

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
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						

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 Em	1.48 tons/year															

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

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shippshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

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
Welding and Thermal Cutting

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

PROCESS	Number of Stations	Max. electrode consumption per station ² (lb/day)	Total Pounds of Electrode per day	EMISSION FACTORS ¹ (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) (Lines 1 & 2)	7	3.50	24.50	5.20E-03	3.18E-04	1.00E-06	1.00E-06	1.00E-06	5.31E-03	3.25E-04	1.02E-06	1.02E-06	1.02E-06	3.28E-04	
Metal Inert Gas (MIG)(E70S) (Line 3)	3	3.50	10.50	5.20E-03	3.18E-04	1.00E-06	1.00E-06	1.00E-06	2.28E-03	1.39E-04	4.38E-07	4.38E-07	4.38E-07	1.40E-04	
EMISSION TOTALS															
Potential to Emit (lb/hr)	Lines 1 & 2								5.31E-03	3.25E-04	1.02E-06	1.02E-06	1.02E-06	3.28E-04	
	Line 3								2.28E-03	1.39E-04	4.38E-07	4.38E-07	4.38E-07	1.40E-04	
	Total								7.58E-03	4.64E-04	1.46E-06	1.46E-06	1.46E-06	4.68E-04	
Potential to Emit (lb/day)	Lines 1 & 2								0.13	7.79E-03	2.45E-05	2.45E-05	2.45E-05	7.86E-03	
	Line 3								5.46E-02	3.34E-03	1.05E-05	1.05E-05	1.05E-05	3.37E-03	
	Total								0.18	1.11E-02	3.50E-05	3.50E-05	3.50E-05	1.12E-02	
Potential to Emit (tons/yr)	Lines 1 & 2								2.33E-02	1.42E-03	4.47E-06	4.47E-06	4.47E-06	1.44E-03	
	Line 3								9.96E-03	6.09E-04	1.92E-06	1.92E-06	1.92E-06	6.15E-04	
	Total								3.32E-02	2.03E-03	6.39E-06	6.39E-06	6.39E-06	2.05E-03	

Notes:

1. Emission Factors from AP-42 Tables 12.19-1 and 12.19-2, GMAW with E70S electrode (SCC 3-09-052-54)
2. Data provided by the source, 2/18/2016

Methodology

Emissions (lb/hr) = Number of Stations x Max. Electrode Consumption per Station (lb/day) x Emission Factor (lb pollutant/lb electrode) / 24 (hr/day)

Potential to Emit (lb/hr) = Emissions (lb/hr)

PTE (lb/day) = PTE (lb/hr) x 24 (hr/day)

PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)

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

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Includes:	Description	ID	Number	Heat Input Capacity (MMBtu/hr)	
				Unit	Total
	Plant 1 Thermocyclers	H1-H5	5	0.464	2.32
	Plant 2 Thermocycler	H6	1	0.464	0.46
	Plant 2 Radiant Tube Heaters	H7-H9	3	0.120	0.36
	Plant 2 Radiant Tube Heaters	H10-H11	2	0.08	0.16
	Total of existing units				3.30
	Lamination Thermocyclers	H12-H16	5	0.464	2.32
	Line 3 Thermocyclers	H17-H20	4	0.55	2.20
	Total of new units				4.52
	Total of all units				7.82

	Heat Input Capacity MMBtu/hr	HHV MMBtu MMCF	Potential Throughput MMCF/yr
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existing (Plt 1 & 2)	3.30	1020	28.4
new (Lamination, Line 3)	4.52		38.8
all	7.82		67.2

Emission Factor in lb/MMCF	Pollutant							
	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84	
Potential Emission in tons/yr	exist	2.70E-02	0.11	0.11	8.51E-03	1.42	7.80E-02	1.19
	new	3.69E-02	0.15	0.15	1.16E-02	1.94	0.11	1.63
	all	6.38E-02	0.26	0.26	2.02E-02	3.36	0.18	2.82

*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						
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics	
Potential Emission in tons/yr	exist	2.98E-05	1.70E-05	1.06E-03	2.55E-02	4.82E-05	2.67E-02
	new	4.08E-05	2.33E-05	1.46E-03	3.49E-02	6.60E-05	3.65E-02
	all	7.06E-05	4.03E-05	2.52E-03	6.05E-02	1.14E-04	6.32E-02

Emission Factor in lb/MMcf	HAPs - Metals						
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals	
Potential Emission in tons/yr	exist	7.09E-06	1.56E-05	1.99E-05	5.39E-06	2.98E-05	7.77E-05
	new	9.70E-06	2.14E-05	2.72E-05	7.38E-06	4.08E-05	1.06E-04
	all	1.68E-05	3.70E-05	4.70E-05	1.28E-05	7.06E-05	1.84E-04

Total HAPs	exist	2.68E-02
	new	3.66E-02
	all	6.34E-02
Worst HAP	exist	2.55E-02
	new	3.49E-02
	all	6.05E-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.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads
Plant 1, Plant 2, and Plant 3**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	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 = $k * [(s/12)^a] * [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	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 = $E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, 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 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)	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, Plant 2, and Plant 3**

Company Name: Highland Ridge RV, Inc.
Source Address: 3195 North State Road 5, Shipshewana, IN 46565
SPR No.: 087-36623-00679
Reviewer: Doug Logan
Date: 2/23/2016

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)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering P1 & P2) (one-way)	5.0	1.0	5.0	15.0	75.0	300	0.057	0.3	103.7
Vehicle (leaving P1 & P2) (one-way)	5.0	1.0	5.0	15.0	75.0	300	0.057	0.3	103.7
Vehicle (entering Line 3) (one-way)	3.0	1.0	3.0	15.0	45.0	300	0.057	0.2	62.2
Vehicle (leaving Line 3) (one-way)	3.0	1.0	3.0	15.0	45.0	300	0.057	0.2	62.2
Total			16.0		240.0			0.9	331.8

Average Vehicle Weight Per Trip = $\frac{15.0}{0.06}$ tons/trip
 Average Miles Per Trip = $\frac{0.06}{0.06}$ 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 P1 & P2) (one-way)	7.14E-02	1.43E-02	3.51E-03	6.55E-02	1.31E-02	3.22E-03	6.55E-02	1.31E-02	3.22E-03
Vehicle (leaving P1 & P2) (one-way)	7.14E-02	1.43E-02	3.51E-03	6.55E-02	1.31E-02	3.22E-03	6.55E-02	1.31E-02	3.22E-03
Total of existing facilities	0.14	2.86E-02	7.01E-03	0.131	2.62E-02	6.43E-03	0.131	2.62E-02	6.43E-03
Vehicle (entering Line 3) (one-way)	4.28E-02	8.57E-03	2.10E-03	3.93E-02	7.86E-03	1.93E-03	3.93E-02	7.86E-03	1.93E-03
Vehicle (leaving Line 3) (one-way)	4.28E-02	8.57E-03	2.10E-03	3.93E-02	7.86E-03	1.93E-03	3.93E-02	7.86E-03	1.93E-03
Total of new facilities	8.57E-02	1.71E-02	4.21E-03	7.86E-02	1.57E-02	3.86E-03	7.86E-02	1.57E-02	3.86E-03
Total of all facilities	0.23	4.57E-02	1.12E-02	0.21	4.19E-02	1.03E-02	0.21	4.19E-02	1.03E-02

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

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

Carol S. Comer
Commissioner

February 25, 2016

Mr. Jason Martin
Highland Ridge RV, Inc.
3195 N SR 5
Shipshewana, IN 46565

Re: Public Notice
Highland Ridge RV, Inc.
Permit Level: Minor Source Operating Permit
(MSOP) Significant Permit Revision
Permit Number: 087-36623-00679

Dear Mr. Martin:

Enclosed is a copy of your draft Minor Source Operating Permit (MSOP) Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange Standard in LaGrange, Indiana publish the abbreviated version of the public notice no later than February 29, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Shipshewana Branch Public Library, 250 Depot Street in Shipshewana, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Doug Logan, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5328 or dial (317) 234-5328.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 24, 2016

LaGrange Standard
PO Box 148
LaGrange, IN 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Highland Ridge RV, Inc., LaGrange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than February 29, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Minor Source Operating Permit (MSOP) Significant Permit Revision
Permit Number: 087-36623-00679

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 25, 2016

To: Shipshewana Branch Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Highland Ridge RV, Inc.
Permit Number: 087-36623-00679

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

February 25, 2016
Highland Ridge RV, Inc.
087-36623-00679

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 2/25/2016 Highland Ridge RV Inc 087-36623-00679 DRAFT		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		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 Roosz 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)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
15			