



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Forest River, Inc. in Elkhart County

MSOP Renewal No.: M039-36976-00295

The Indiana Department of Environmental Management (IDEM) has received an application from Forest River, Inc. located at 58277 State Road 19 South, Elkhart, IN 46517 for a renewal of its MSOP issued on July 26, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Forest River, Inc. to continue to operate its existing source.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Wakarusa Public Library
124 North Elkhart St.
Wakarusa, IN 46573

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 M039-36976-00295 in all correspondence.

Comments should be sent to:

Thomas Olmstead
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-9664
Or dial directly: (317) 233-9664
Fax: (317) 232-6749 attn: Thomas Olmstead
E-mail: tolmstea@idem.IN.gov

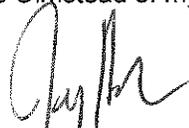
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 Thomas Olmstead of my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

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Commissioner

DRAFT

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Forest River, Inc.
58277 State Road 19 South
Elkhart, Indiana 46517**

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

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

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

Operation Permit No.: M039-36976-00295	
Issued by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary RV manufacturing plant.

Source Address:	58277 State Road 19 South, Elkhart, Indiana 46517
General Source Phone Number:	(574) 534-6913
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) recreational vehicle (RV) Assembly Line, permitted in 2001, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, permitted in 2001, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour, and controlled by dry particulate filters;
- (c) One (1) body putty application process, permitted in 2001, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;
- (d) One (1) side wall and roof assembly lamination process, permitted in 2001, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour;
- (e) One (1) Foam Seal Shop, permitted in 2001, extruding urethane foam sealant into the cavities of plastic RV bodies;
- (f) One (1) woodworking operation, permitted in 2001, identified as the Cabinet Shop, with a maximum capacity of 1.375 RVs per hour, using an integral dust collector for particulate control, and exhausting indoors;
- (g) Five (5) metal inert gas (MIG) Welding Stations, permitted in 2001, with a combined maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M039-36976-00295, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

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

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M039-36976-00295 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

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

- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) recreational vehicle (RV) Assembly Line, permitted in 2001, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, permitted in 2001, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour, and controlled by dry particulate filters;

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

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

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

Pursuant to 326 IAC 8-2-9, when coating metal, the one (1) recreational vehicle (RV) Assembly Line shall not allow the discharge into the atmosphere VOC in excess of the following:

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

If more than one (1) emission limitation applies to a specific coating, then the least stringent emission limit shall be applied.

D.1.2 Volatile Organic Compound (VOC) Limitations, Work Practice Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the one (1) recreational vehicle (RV) Assembly Line shall comply with the following:

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to the following:

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

- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to MSOP 039-10341-00295, when not coating metal, the Best Available Control Technology (BACT) for the Assembly Line has been determined to be a VOC limitation of 52 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the following work practice standards:

- (a) Forest River Inc. shall apply all sealants, adhesives, and cleaners with extrusion ("squeeze tubes"), brushing, and hand wiping techniques.
- (b) Minor amounts of paint shall be applied using aerosol spray cans which is a form of airless spray technology.
- (c) Employees shall close open containers when not in use.

D.1.4 Particulate Emissions Limitations [326 IAC 6-3-2(d)]

- (a) Particulate from the Plastic Skirt and Touch-up Paint Booth shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limit contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ,

reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

When using non-compliant coatings, compliance with the VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily or monthly, as prescribed, and shall be complete and sufficient to establish compliance with the VOC content limits established in Conditions D.1.1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The dates and times each coating is applied.
 - (4) The dates and times non-compliant coatings are used.
 - (5) During periods when non-compliant coatings are used:
 - (A) The volume weighted VOC content less water of the coatings used for each day.
 - (6) The total VOC usage, including coating, dilution solvents, and cleaning solvents, for each month and each compliance period.
 - (7) The total VOC emitted for each month and each compliance period.
- (b) To document the compliance status with Condition D.1.4, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) woodworking operation, permitted in 2001, identified as the Cabinet Shop, with a maximum capacity of 1.375 RVs per hour, using an integral dust collector for particulate control, and exhausting indoors;

(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 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.2 Particulate Control

In order to assure the Cabinet Shop is exempt from the requirements of 326 IAC 6-3-2, the integral dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking equipment is in operation.

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

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

D.2.3 Broken or Failed Bag Detection - Dust Collector

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

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

D.2.4 Dust Collector Inspections

The Permittee shall perform semi-annual inspections of the integral dust collector controlling

particulate from the Cabinet Shop to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of the dates and results of the inspections.

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Forest River, Inc.
Address:	58277 State Road 19 South
City:	Elkhart, Indiana 46517
Phone #:	(574) 534-6913
MSOP #:	M039-36976-00295

I hereby certify that Forest River, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Forest River, Inc. is :

in compliance with the requirements of MSOP M039-36976-00295.

not in compliance with the requirements of MSOP M039-36976-00295.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Forest River, Inc.
Source Location:	58277 State Road 19 South, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3792 (Travel Trailers and Campers)
Permit Renewal No.:	M039-36976-00295
Permit Reviewer:	Thomas Olmstead

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Forest River, Inc. relating to the operation of a stationary RV manufacturing plant. On March 21, 2016, Forest River, Inc. submitted an application to the OAQ requesting to renew its operating permit. Forest River, Inc. was issued its first MSOP Renewal M039-22760-00295 on July 26, 2006.

Source Definition

The following two (2) plants were considered one source from Source Definition M039-10341-00295:

- (a) Plant 1 is located at 58277 State Road 19 South, Elkhart, IN 46517; and
- (b) Plant 2 is located at 27824 County Road 20 (also known as Mishawaka Road), Elkhart, IN 46517

The source is selling Plant 2 and all operating equipment will be moved from Plant 2 to Plant 1. Therefore, Plant 2 will no longer be included in the operating permit.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) recreational vehicle (RV) Assembly Line, permitted in 2001, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, permitted in 2001, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour, and controlled by dry particulate filters;
- (c) One (1) body putty application process, permitted in 2001, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;
- (d) One (1) side wall and roof assembly lamination process, permitted in 2001, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour;

- (e) One (1) Foam Seal Shop, permitted in 2001, extruding urethane foam sealant into the cavities of plastic RV bodies;
- (f) One (1) woodworking operation, permitted in 2001, identified as the Cabinet Shop, with a maximum capacity of 1.375 RVs per hour, using an integral dust collector for particulate control, and exhausting indoors;
- (g) Five (5) metal inert gas (MIG) Welding Stations, permitted in 2001, with a combined maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The source is selling Plant 2 and all operating equipment will be moved from Plant 2 to Plant 1. Therefore, Plant 2 will no longer be included in the operating permit. There has only been one (1) side wall and roof assembly lamination process, identified as Lamination, located at the source in Plant 2. Plant 1 never had a lamination process and was incorrectly specified in the operating permit.

Existing Approvals

Since the issuance of the MSOP Renewal 039-22760-00295 on July 26, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. (039-25828-00295), issued on February 1, 2008.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.	

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

- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) **Other Criteria Pollutants**
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

-	
Pollutant	Tons/year
PM	2.38
PM ₁₀	2.38
PM _{2.5}	2.38
SO ₂	--
NO _x	--
VOC	50.19
CO	--
Total HAP	5.57

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

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)							
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs
Assembly	0.67	0.67	0.67	--	--	37.61	--	1.34
Plastic Skirt and Touch-up Paint Booth	0.03	0.03	0.03	--	--	11.31	--	2.00
Paint Prep Shop	0.00E+00	0.00E+00	0.00E+00	--	--	1.27	--	2.15
Lamination and Foam Seal Shop1	--	--	--	--	--	negl.	--	negl.
Cabinet Shop	0.07	0.07	0.07	--	--	--	--	--
Welding Stations	1.12	1.12	1.12	--	--	--	--	0.08
Total PTE of Entire Source	1.89	1.89	1.89	--	--	50.19	--	5.57
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 25
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA
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} .								

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon Appendix A of this document.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) 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.

NSPS

- (b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in this permit, since the source does not coat metal furniture.
- (c) The stationary travel trailer assembly plant does not meet the definition of automobile and light-duty truck body according to the definition in 40 CFR 60.391. Therefore, the New Source Performance Standards for automobile and light duty truck surface coating operations (40 CFR 60, Subpart MM) are not included in this permit.

NESHAP

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ) are not included in this permit, since this source does not engage in the production of wood furniture or wood furniture components.
- (e) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks (40 CFR 63, Subpart IIII) are not included in this permit, since this source does not meet the definition of automobile and light-duty truck according to the definition in 40 CFR 63.3176.
- (f) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) are not included in this permit, since this source is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (40 CFR 63.4480 - 63.4581, Subpart PPPP) are not included in this permit, since this source is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Furniture (40 CFR 63 Subpart RRRR), are not included in this permit, since this source does not coat metal furniture as defined in §63.4981.
- (i) 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 Subpart HHHHHH (6H)), are not included for the source for the following reasons:
 - (a) Pursuant to 63.11170(a)(2), the source does not meet the definition of *motor vehicle and mobile equipment surface coating* as defined in 63.11180, because *motor vehicle and mobile equipment surface coating* does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle

assembly plant or parts manufacturing plant. Therefore, the source is not subject to 40 CFR 63, Subpart HHHHHH.

- (b) Pursuant to 63.11170(a)(3), the source does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) to a plastic and/or metal substrate on a part or product. The coatings sprayed by the source consist of coatings containing compounds of toluene, xylene, ethylbenzene, hexane, and hexamethylene-1, 6-diisocyanate. Therefore, the source is not subject to 40 CFR 63, Subpart HHHHHH.
- (j) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX) are not included in this permit, since this source does not own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in 40 CFR 63.11514.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

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

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

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2, the source does not coat passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles.

326 IAC 8-2-6 (Metal furniture coating operations)

The requirements of 326 IAC 8-2-6 are not applicable to this source, since this source does not perform surface coating of any furniture made of metal or any metal part that will be assembled with other metal, wood, fabric, plastic, or glass parts to form a furniture piece.

326 IAC 8-5-1 (Miscellaneous Operations)

This source does not engage in any of the miscellaneous operations specified in 326 IAC 8-5-1. Therefore, the requirements of 326 IAC 8-5-1 are not applicable.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The provisions in 326 IAC 8-6-1 (Organic Solvent Emission Limitations) do not apply to the source because the source did not have potential emissions of 90.7 megagrams (100 tons) or greater per year of VOC after October 7, 1974, and prior to January 1, 1980. Therefore, 326 IAC 8-6-1 (Organic Solvent Emission Limitations) does not apply to the source.

State Rule Applicability – Individual Facilities

Coating Operations

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

Pursuant to 326 IAC 6-3-1(b)(5-8)), surface coating using dip, roll, flow, or brush coating are exempt from 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1(b)(15) surface coating operations not exempt in 326 IAC 6-3-1(b)(5-8) that use less than five (5) gallons per day are exempt from 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1.5(5), "Surface coating" means the application of a solvent or waterbased coating in which the applicant emits or has the potential to emit particulate.

The requirements of 326 IAC 6-3-2 are not applicable to the one (1) recreational vehicle (RV) Assembly Line since the surface coatings not exempted under 326 IAC 6-3-1(b)(5-8) are applied in quantities of less than five gallons per day.

The requirements of 326 IAC 6-3-2 are not applicable to the Paint Prep Shop since no particle emissions are generated from the surface coating application process.

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to the Plastic Skirt and Touch-up Paint Booth, since the unit has the potential to use more than five (5) gallons of coating per day.

Pursuant to 326 IAC 6-3-2(d), the source shall comply with the following:

- (a) Particulate from the Plastic Skirt and Touch-up Paint Booth shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Plastic Skirt and Touch-up Paint Booth and the Paint Prep Shop are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each facility is less than twenty-five (25) tons per year.

Pursuant to MSOP 039-10341-00295, the Best Available Control Technology (BACT) for the Assembly Line has been determined to be a VOC limitation of 52 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the following work practice standards:

- (a) Forest River Inc. shall apply all sealants, adhesives, and cleaners with extrusion ("squeeze tubes"), brushing, and hand wiping techniques.
- (b) Minor amounts of paint shall be applied using aerosol spray cans which is a form of airless spray technology.
- (c) Employees shall close open containers when not in use.

326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations)

The Plastic Skirt and Touch-up Paint Booth and the Paint Prep Shop are not subject to the requirements of 326 IAC 8-2-9, since the facilities do not coat metal.

The metal coating in the one (1) recreational vehicle (RV) Assembly Line will have actual VOC emissions greater than 15 lbs/day. The BACT (MSOP 039-10341-00295) for the Assembly Line was for when the source applies adhesives to structural wood and to plastic (not wood furniture or cabinets or to metal substrates). Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of the following: for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for the one (1) recreational vehicle (RV) Assembly Line when coating metal.

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from the one (1) recreational vehicle (RV) Assembly Line for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

Woodworking Operation

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

The potential to emit from the Cabinet Shop is less than 0.551 pound per hour after control. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply.

The integral dust collector shall be in operation at all times to assure the Cabinet Shop is exempt from the requirements of 326 IAC 6-3-2.

Welding

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

Pursuant to 326 IAC 6-3-1(b)(9) the metal inert gas (MIG) welding stations and manual stick welding station located at the source, are exempt from the requirements of 326 IAC 6-3, because their potential to consume welding wire is less than six hundred twenty-five (625) pounds per day, each.

Compliance Determination and Monitoring Requirements

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

- (a) The one (1) recreational vehicle (RV) Assembly Line has applicable compliance determination conditions as specified below:
 - (1) Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
 - (2) When using non-compliant coatings, compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

- (b) The Cabinet Shop has applicable compliance determination conditions as specified below:
 - (1) The integral dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking equipment is in operation.

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

- (a) The one (1) woodworking shop has applicable compliance monitoring conditions as specified below:

Control	Parameter	Frequency	Range
Baghouse	Baghouse Inspections	Quarterly	Normal - Abnormal

These monitoring conditions are necessary because the dust collector is an integral device for the woodworking equipment and must operate properly to ensure the woodworking operation is exempt from the requirements of 326 IAC 6-3-2.

Proposed Changes

The following changes listed below have been made to MSOP No. M039-25828-00295. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

Proposed Changes

- (a) Typographical errors have been corrected throughout.
- (b) Conditions have been renumbered throughout.

Section A

- (c) Condition A.1 - General Information has been revised as follows:
 - 1. To remove the mailing address for the source because IDEM no longer lists the mailing address in Section A of the permit.
 - 2. To specify the SIC code and remove SIC code 3716 (Motor Homes) because the source no longer manufactures motor homes.
 - 3. To include the change in phone number for the source contact and to specify that the source is Not 1 of 28 Source Categories.
- (d) Condition A.1 - General Information has been revised, Condition A.2 - Minor Source Operating Permit Source Definition has been removed, and Condition A.2 - Emission Units and Pollution Control Equipment Summary of the permit have been revised because the source is selling Plant 2 and all operating equipment will be moved from Plant 2 to Plant 1. Therefore, Plant 2 will no longer be included in the operating permit and will not be considered one source with Plant 1.
- (e) Condition A.2 - Emission Units and Pollution Control Equipment Summary and Sections D.1 and D.2 Emissions Unit Description Boxes have been revised as follows:

1. Permitted in 2001 has been added to all of the emission units for descriptive purposes and rule applicability.
 2. The Plastic Skirt and Touch-up Paint Booth is controlled by dry particulate filters.
 3. There has only been one (1) side wall and roof assembly lamination process, identified as Lamination, located at the source in Plant 2. Plant 1 never had a lamination process and was incorrectly specified in the operating permit.
 4. The Cabinet Shop only has one dust collector and can manufacture 1.375 RVs per hour.
- (f) **Multiple Conditions - Certification Requirement References**
IDEM, OAQ has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
- (g) **Multiple Conditions - Branch Name Updates**
Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
- (h) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.
- (i) **Section B - Permit Renewal**
The Air Board adopted LSA Document #07-202, effective June 6, 2008, that changed a MSOP renewal application due date to one hundred twenty (120) prior to expiration of the current permit.
- (j) **Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements**
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed.
- (k) **Section B - Permit Renewal**
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (l) **Section B - Inspection and Entry**
IDEM, OAQ has decided to state at reasonable times the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform activities.

- (m) **Section C - Opacity**
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (n) **Section C - Open Burning and Incineration**
IDEM, OAQ has added 326 IAC 4-1 and 326 IAC 4-2 because the source is subject to 326 IAC 4-1 when open burning and 326 IAC 4-2 when operating an incinerator.
- (o) **Section C - Stack Height**
The source does not have a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide. Therefore, 326 IAC 1-7 (Stack Height Provisions) does not apply.
- (p) **Section C - Asbestos Abatement Projects**
IDEM, OAQ has revised paragraph (g) of Section C - Asbestos Abatement Projects to match the rule language in 326 IAC 14-10-1(a).
- (q) **Section C - Performance Testing**
IDEM, OAQ has added 326 IAC 3-6 Performance Testing to the permit for any performance testing required by the permit.
- (r) **Section C - Monitoring Methods**
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (s) **Section C - Instrument Specifications**
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (t) **Section C - Response to Excursions or Exceedances**
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (u) **Section C - Actions Related to Noncompliance Demonstrated by a Stack Test**
IDEM, OAQ has added Actions Related to Noncompliance Demonstrated by a Stack Test to the permit for any performance testing required by the permit.
- (v) **Section C - General Record Keeping Requirements**
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

Section D

- (w) Conditions D.1.1 Volatile Organic Compounds (VOC) and D.1.2 Volatile Organic Compound (VOC) Limitations, Work Practice Requirements have been added to the permit because the metal coating in the one (1) recreational vehicle (RV) Assembly Line will have actual VOC emissions greater than 15 lbs/day and is therefore subject to 326 IAC 8-2-9.
- (x) Original Condition D.1.1 Particulate Emissions Limitations has been moved to Condition D.1.4 Particulate Emissions Limitations.
- (y) Condition D.1.7 Volatile Organic Compounds (VOC) has been added to the permit so that the source can demonstrate compliance with 326 IAC 8-2-9 when using non-compliant coatings.
- (z) Condition D.1.8 has been revised to update the record keeping requirements for complying with 326 IAC 8-2-9.
- (aa) After discussions with EPA, IDEM has decided to add rule cites for the subsection titles of the D Sections. The addition of this rule cite is to satisfy EPA's concerns. IDEM has added a citation to 326 IAC 2-6.1-5(a)(2) to the subheadings in D Sections.
- (bb) Condition D.2.1(a) has been removed from the permit because the potential to emit from the one (1) woodworking operation is less than 0.551 pound per hour after control. In order to assure the Cabinet Shop is exempt from the requirements of 326 IAC 6-3-2, the integral dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking equipment is in operation. Conditions D.2.3 Broken or Failed Bag Detection - Dust Collector, D.2.4 Dust Collector Inspections, and D.2.5 Record Keeping Requirement have been added to the permit to maintain compliance with 326 IAC 6-3-2.
- (cc) Condition D.2.1 and Section D.2 Emissions Unit Description Box have been revised to remove the emission units and limits for the five (5) MIG Welding Stations and the Paint Prep Shop. The potential to consume welding wire is less than six hundred twenty-five (625) pounds per day from the five (5) MIG Welding Stations, each. The requirements of 326 IAC 6-3-2 are not applicable to the Paint Prep Shop since no particle emissions are generated from the surface coating application process.

The permit has been revised as follows:

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.32 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 ~~combined source consisting of two (2)-stationary RV manufacturing Plants~~ **plant.**

Source Address: 58277 State Rd ~~Rd~~ 19 South and 27824 County Rd
20, Elkhart, IN ~~Indiana~~ 46517
Mailing Address: P.O. Box 3030, Elkhart, IN 46515-3030

General Source Phone Number: (574) ~~296-7700~~**534-6913**
SIC Code: ~~3716, 3792~~ **(Travel Trailers and Campers)**
County Location: Elkhart
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act

~~A.2 — Minor~~**Not 1 of 28 Source Operating Permit
Source Definition Categories**

~~The Source Definition from M039-10341-00295 was incorporated into this permit as follows:~~

~~— This towable and motorized recreational vehicle company consists of two (2) plants:~~

~~(a) — Plant 1 is located at 58277 State Road 19 South, Elkhart, IN 46517; and~~

~~(b) — Plant 2 is located at 27824 County Road 20 (also known as Mishawaka Road), Elkhart, IN 46517~~

~~Since the two (2) plants are about one (1) mile apart from each other, are operating under common ownership, have the same SIC Codes (3716 and 3792), and Plant 2 (the Mishawaka Road) plant provides more than 50% of the welded items to the Plant 1, they will be considered one source.~~

~~One combined Minor Source Operating Permit will be issued to Forest River, Inc. The plant ID for the combined source is 039-00295.~~

A.32 Emission Units and Pollution Control Equipment Summary

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

~~Plant 1 consists of the following emission units:~~

- (a) One (1) recreational vehicle (RV) Assembly Line, **permitted in 2001**, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, **permitted in 2001**, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour, **and controlled by dry particulate filters**;
- (c) One (1) body putty application process, **permitted in 2001**, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;
- (d) One (1) side wall and roof assembly lamination process, **permitted in 2001**, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour;
- (e) One (1) Foam Seal Shop, **permitted in 2001**, extruding urethane foam sealant into the cavities of plastic RV bodies; ~~and~~
- (f) One (1) woodworking operation, **permitted in 2001**, identified as the Cabinet Shop, with a maximum process weight rate capacity of 500 pounds of lumber **1.375 RVs** per hour, **with using an integral dust collector for particulate matter emissions controlled by individual portable particulate matter collection systems, vented to the control, and**

exhausting indoors-;

Plant 2 consists of the following emission units:

- (g) Five (5) metal inert gas (MIG) Welding Stations, **permitted in 2001**, with a ~~combine~~**combined** maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour; ~~and.~~
- ~~(g) One (1) side wall and roof assembly lamination process, identified as Lamination, using urethane adhesive to assemble 1.375 RV roofs per hour and 2.75 RV side walls per hour.~~

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, ~~039-22760~~**M039-36976-00295**, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.4 Enforceability

B.5 Severability

B.6 Property Rights or Exclusive Privilege

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

~~Compliance Branch, Office of Air Quality~~
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.109 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement~~ **A Preventive Maintenance Plans (PMPs) including the following information on each facility Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) **Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) **A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) **Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

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

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

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. ~~The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(d)~~ To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to ~~039-22760~~ **M039-36976-00295** and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) ~~(3)~~—deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ~~ninety (90)~~ **one hundred twenty (120)** days prior to the date of expiration of the ~~source's~~ **source's** existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Deviations from Permit Requirements and Conditions

~~(a) Deviations from any permit requirements (for emergencies see Section B- Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to 12 Compliance Data Section, Office of Air Quality~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

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

- (a) The application for renewal shall be submitted using the application form or forms

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ~~ninety (90)~~ **one hundred twenty (120)** days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the ~~source's~~ **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.4513 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

Indiana Department of Environmental Management
~~Permits Branch, Office of Air Quality~~

Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.4614 Source Modification Requirement

B.4715 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~~ **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

B.4816 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

Indiana Department of Environmental Management
~~Permits Branch, Office of Air Quality~~

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

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

- (c) 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.4917 Annual Fee Payment [326 IAC 2-1.1-7]

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

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

B.20-18 Credible Evidence [326 IAC 1-1-6]

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 ~~non-overlapping~~ **nonoverlapping** integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

~~C.5 Stack Height [326 IAC 1-7]~~

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

~~C.6 Asbestos Abatement Projects [326 IAC 14-10-1][326 IAC 18-1-1][40 CFR 61, Subpart M]~~

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
~~Asbestos Section, Office of Air Quality~~

Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-5253 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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.79~~ Compliance Requirements [326 IAC 2-1.1-11]

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

~~C.-810~~ Compliance Monitoring [326 IAC 2-1.1-11]

~~C.9~~ ~~Monitoring Methods~~ [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

~~C.4011~~ 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.**

Corrective Actions and Response Steps

~~C.4412~~ Response to Excursions or Exceedances

~~(a)~~ 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 ~~and taking any necessary corrective actions to restore normal operation and prevent the~~

~~likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).~~ Corrective actions. **The response** may include, but ~~are~~ is not limited to, the following:

- (1) 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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~ **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 ~~maintain the following records:~~ **record the reasonable response steps taken.**
- (1) ~~monitoring data;~~
 - (2) ~~monitor performance data, if applicable; and~~
 - (3) ~~corrective actions taken.~~

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

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

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

C.4214 Malfunctions Report [326 IAC 1-6-2]

C.4315 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 implemented within **allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.**

C.4416 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- ~~(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(c)~~ Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- ~~(e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.~~

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) recreational vehicle (RV) Assembly Line, **permitted in 2001**, manufacturing 1.375 RVs per hour, applying various sealants, adhesives and cleaners, using extrusion, brushing and hand wiping techniques, and applying minor amounts of paint using aerosol spray cans;
- (b) One (1) surface coating spray booth, **permitted in 2001**, identified as Plastic Skirt and Touch-up Paint Booth, utilizing an air atomization or HVLP spray application system, coating a maximum of 1.375 RV skirts (plastic) per hour, **and controlled by dry particulate filters;**

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

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

~~D.1.1 Particulate Emissions Limitations~~**Volatile Organic Compounds (VOC)** [326 IAC ~~6-3- 8-2-9~~]

~~Pursuant to 326 IAC 6-3-2(d), the Plastic Skirt and Touch-up Paint Booth surface coating operations shall be controlled by a dry particulate filter, waterwash, or an equivalent control device operated in accordance with the manufacturer's specifications. If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such an observation.~~

~~(a) Repair control device so that no overspray is visibly detected~~**Pursuant to 326 IAC 8-2-9, when coating metal, the one (1) recreational vehicle (RV) Assembly Line shall not allow the discharge into the atmosphere VOC in excess of the following:**

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

If more than one (1) emission limitation applies to a specific coating, then the least stringent emission limit shall be applied.

D.1.2 Volatile Organic Compound (VOC) Limitations, Work Practice Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the one (1) recreational vehicle (RV) Assembly Line shall comply with the following:

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to the following:

- (a) **Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.**
- (b) **Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept at all times except when depositing or removing these materials.**
- (c) **Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.**
- (d) **Convey VOC containing coatings, thinners, coating related waste, and cleaning**

materials from one (1) location to another in closed containers or pipes.

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

~~D.1.3b) Operate equipment so that no overspray is visibly detected at the exhaust or accumulates on the ground.~~

~~If over spray is visibly detected, the source shall maintain a record of the action taken as a result of an inspection, any repairs of control devices, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

D.1.23 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to MSOP 039-10341-00295, **when not coating metal**, the Best Available Control Technology (BACT) for the Assembly Line has been determined to be a VOC limitation of 52 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the following work practice standards:

- (a) Forest River Inc. shall apply all sealants, adhesives, and cleaners with extrusion ("squeeze tubes"), brushing, and hand wiping techniques.
- (b) Minor amounts of paint shall be applied using aerosol spray cans which is a form of airless spray technology.
- (c) Employees shall close open containers when not in use.

D.1.4 Particulate Emissions Limitations [326 IAC 6-3-2(d)]

- (a) Particulate from the Plastic Skirt and Touch-up Paint Booth shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.**
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:**
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

~~D.1.3~~ **D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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

D.1.46 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content **limit** contained in ~~condition~~ **Conditions D.1.21 and D.1.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

When using non-compliant coatings, compliance with the VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

Record Keeping **and Reporting** Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.58 Record Keeping Requirements

(a) To document compliance with ~~condition~~ **Conditions D.1.21 and D.1.3**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken ~~as stated below~~ **daily or monthly, as prescribed**, and shall be complete and sufficient to establish compliance with the VOC ~~usage limit~~ **content limits** established in ~~condition~~ **Conditions D.1.21 and D.1.3**.

(1), 1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on ~~monthly~~ **a daily** basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The ~~monthly cleanup solvent usage;~~ **dates and times each coating is applied.**
- (4) **The dates and times non-compliant coatings are used.**
- (5) **During periods when non-compliant coatings are used:**

- (A) **The volume weighted VOC content less water of the coatings used for each day.**
- (6) **The total VOC usage, including coating, dilution solvents, and cleaning solvents, for each month and each compliance period.**
- (7) **The total VOC emitted for each month and each compliance period.**
- (b) To document **the compliance status** with Condition D.1.44, the Permittee shall maintain ~~records in a record of any actions taken if overspray is visibly detected.~~
~~accordance with condition D.1.1.~~
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of-~~ **contains the Permittee's obligations with regard to the records required by this permit condition.**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) ~~One (1) body putty application process, identified as Paint Prep Shop, applying putty to a maximum of 1.375 RVs per hour;~~
- (g)(f) One (1) woodworking operation, **permitted in 2001**, identified as the Cabinet Shop, with a maximum process weight rate capacity of 500 pounds of lumber **1.375 RVs per hour, with using an integral dust collector for particulate matter emissions controlled by individual portable particulate matter collection systems, vented to the control, and exhausting indoors.;**
- (h) ~~Five (5) metal inert gas (MIG) Welding Stations, with a combine maximum process weight rate of 759 pounds per hour and one (1) Stick Welding Station, with a maximum process weight rate of 759 pounds per hour.~~

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

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

D.2.1 ~~Particulate Emission Limitations for Manufacturing Processes~~ **Preventive Maintenance Plan**
[326 IAC 1-6-3-2]

~~Pursuant to 326 IAC 6-3-2(e), the particulate matter shall be limited by the following:~~

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

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

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

- (a) ~~The particulate emissions from the woodworking identified as the Cabinet Shop shall not exceed 1.62 lbs per hour based on process weight rate of 0.250 tons per hour.~~
A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

~~The particulate emissions from the five (5) MIG Welding Stations combined shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour. The particulate emissions from the one (1) Stick Welding Station shall not exceed 2.14 pounds per hour based on a process weight rate of 0.380 tons per hour.~~

~~(c) The particulate emissions from the body putty application process identified as Paint Prep Shop, shall not exceed 26.1 pounds per hour based on a process weight rate of 15.8 tons per hour.~~

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

D.2.2 Particulate ~~Emissions Control~~

In order to comply with D.2.1(a), ~~assure the portable~~ **Cabinet Shop is exempt from the requirements of 326 IAC 6-3-2, the integral dust collector for particulate matter collection systems control shall be in operation and control emissions from the woodworking operation at all times that the woodworking equipment is in operation.**

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

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

D.2.3 Broken or Failed Bag Detection - Dust Collector

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

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

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

D.2.4 Dust Collector Inspections

The Permittee shall perform semi-annual inspections of the integral dust collector controlling particulate from the Cabinet Shop, is in operation to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of the dates and results of the inspections.**
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 21, 2016.

Conclusion

The operation of this stationary RV manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. 039-36976-00295.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Thomas Olmstead at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Plt ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs
Assembly	0.67	0.67	0.67	--	--	37.61	--	1.34
Plastic Skirt and Touch-up Paint Booth	0.52	0.52	0.52	--	--	11.31	--	2.00
Paint Prep Shop	0.00E+00	0.00E+00	0.00E+00	--	--	1.27	--	2.15
Lamination and Foam Seal Shop ¹	--	--	--	--	--	negl.	--	negl.
Cabinet Shop	0.07	0.07	0.07	--	--	--	--	--
Welding Stations	1.12	1.12	1.12	--	--	--	--	0.08
Total	2.38	2.38	2.38	--	--	50.19	--	5.57

* PM2.5 listed is direct PM2.5

1. VOC and HAP emissions are negligible based on Alliance for the Polyurethanes Industry: Estimating MDI Emissions for Section 313 of EPCRA Reporting

Potential to Emit after Control (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs
Assembly	0.67	0.67	0.67	--	--	37.61	--	1.34
Plastic Skirt and Touch-up Paint Booth	0.03	0.03	0.03	--	--	11.31	--	2.00
Paint Prep Shop	0.00E+00	0.00E+00	0.00E+00	--	--	1.27	--	2.15
Lamination and Foam Seal Shop ¹	--	--	--	--	--	negl.	--	negl.
Cabinet Shop	0.07	0.07	0.07	--	--	--	--	--
Welding Stations	1.12	1.12	1.12	--	--	--	--	0.08
Total	1.89	1.89	1.89	--	--	50.19	--	5.57

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs
Assembly	0.67	0.67	0.67	--	--	37.61	--	1.34
Plastic Skirt and Touch-up Paint Booth	0.03	0.03	0.03	--	--	11.31	--	2.00
Paint Prep Shop	0.00E+00	0.00E+00	0.00E+00	--	--	1.27	--	2.15
Lamination and Foam Seal Shop ¹	--	--	--	--	--	negl.	--	negl.
Cabinet Shop	0.07	0.07	0.07	--	--	--	--	--
Welding Stations	1.12	1.12	1.12	--	--	--	--	0.08
Total	1.89	1.89	1.89	--	--	50.19	--	5.57

* PM2.5 listed is direct PM2.5

Note: Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Plt ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons Used (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Application Methods	Substrate
Reducer	7.21	100.00%	0.0%	100.00%	0.0%	0.00%	0.05280	1.375	1.74	7.21	7.21	0.52	12.56	2.29	0.00E+00	--	50%	air atomization or HVLP	Plastic
Hardener	7.84	0.00%	0.0%	0.00%	0.0%	100.00%	0.00350	1.375	0.12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.08	0.00E+00	50%	air atomization or HVLP	Plastic
Stabilizer	7.25	97.50%	0.0%	97.50%	0.0%	1.50%	0.07170	1.375	2.37	7.07	7.07	0.70	16.73	3.05	0.04	471.25	50%	air atomization or HVLP	Plastic
7000 Base	9.2	88.30%	0.0%	88.30%	0.0%	20.00%	0.12200	1.375	4.03	8.12	8.12	1.36	32.71	5.97	0.40	40.62	50%	air atomization or HVLP	Plastic

Total Potential to Emit	Add worst case coating to all solvents	Total Gallons Used (gal/day)	8.25	2.58	61.99	11.31	0.52
		Total not-exempt under 326 IAC 6-3-2	8.25				
				Control efficiency filters	95%		
				Controlled PM with filter	0.03		

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)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (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
VOC and Particulate
Paint Prep Shop**

**Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Plt ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
3M Bondo Autobody Filler Repair Kit	9.51	17.80%	0.00%	17.80%	0.00%	82.20%	0.125	1.375	1.69	1.69	0.29	6.98	1.27	0.00E+00	2.06	100%

Total Potential to Emit

Add worst case coating to all solvents

0.29	6.98	1.27	0.00E+00
-------------	-------------	-------------	-----------------

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)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (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: Emission Calculations
HAP Emission Calculations

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Pit ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % Hexane	Weight % Hexamethylene-1, 6-diisocyanate	Weight % Styrene	Weight % MIBK	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Hexamethylene-1, 6-diisocyanate Emissions (ton/yr)	Styrene Emissions (ton/yr)	MIBK Emissions (ton/yr)
Assembly Line																	
Black Paint	7.9	0.12500	1.375	8.16%	5.29%						0.49	0.31					
Sealer	11.31	0.00358	1.375	30.70%	13.62%					6.70%	0.07	0.03					0.02
PreCleaner	6.37	0.03580	1.375	14.51%							0.20						
Contact Adhesive	8.2	0.00808	1.375						35.00%					0.14			
Spray Go Paint	6.088	0.00200	1.375	5.00%	10.00%	3.00%					3.67E-03	0.01	2.20E-03				
Sta-Put Adhesive	6.505	0.00444	1.375											0.06			
Plastic Skirt and Touch-up Paint Booth																	
Reducer	7.21	0.05280	1.375	8.00%							0.18						
Hardener	7.84	0.00350	1.375					0.20%							3.31E-04		
Stabilizer	7.25	0.07170	1.375	27.00%	26.00%	5.00%					0.85	0.81	0.16				
Paint Prep Shop																	
3M Bondo Autobody Filler Repair Kit	9.51	0.12500	1.375						30.00%							2.15	

Total Potential Emissions 1.79 1.17 0.16 0.20 3.31E-04 2.15 0.02

METHODOLOGY Total HAPs = 5.48

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: Emission Calculations
PM, PM 10 and PM2.5 Emissions
Woodworking Operations**

**Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Plt ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016**

Facility	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	PTE of PM/PM10/PM2.5 after Integral Baghouse (lbs/hr)	PTE of PM/PM10/PM2.5 after Integral Baghouse (tons/yr)	PTE of PM/PM10/PM2.5 prior to Integral Baghouse (lbs/hr)	PTE of PM/PM10/PM2.5 prior to Integral Baghouse (tons/yr)
Cabinet Shop	Dust Collector	0.00073	2500	0.02	0.07	0.78	3.43
Total				0.02	0.07	0.78	3.43

Assume all PM emissions equal PM10 and PM2.5

Methodology

Note 98% control efficiency was used to calculate emissions before control.

PTE of PM/PM10/PM2.5 after Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM10/PM2.5 after Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM10/PM2.5 before Control = PTE of PM/PM10/PM2.5 after Control / (1-Control Efficiency)

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Forest River, Inc.
Address City IN Zip: 58277 State Road 19 South, Elkhart, IN 46517
Permit No./Plt ID: M039-36976-00295
Reviewer: Thomas Olmstead
Date: April, 2016

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	5	5.75575	0.0055	0.0005			0.158	0.014	0.00E+00	0.00E+00	0.014
Stick (E7018 electrode)	1	4.66125	0.0211	0.0009			0.098	0.004	0.00E+00	0.00E+00	0.004
EMISSION TOTALS											
Potential Emissions lbs/hr							0.26	0.02	0.00E+00	0.00E+00	0.02
Potential Emissions lbs/day							6.16	0.45	0.00E+00	0.00E+00	0.45
Potential Emissions tons/year							1.12	0.08	0.00E+00	0.00E+00	0.08

Methodology:

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

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



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

June 3, 2016

Mr. William G. Conway
Forest River, Inc.
PO Box 3030
Elkhart, IN 46515-3030

Re: Public Notice
Forest River, Inc.
Permit Level:
Minor Source Operating Permit (MSOP) Renewal
Permit Number: 039-36976-00295

Dear Mr. Conway:

Enclosed is a copy of your draft Minor Source Operating Permit (MSOP) Renewal, 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 Elkhart Truth in Elkhart, Indiana publish the abbreviated version of the public notice no later than June 6, 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 Wakarusa Public Library, 124 North Elkhart Street in Wakarusa, 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 Thomas Olmstead, 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 3-9664 or dial (317) 233-9664.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

June 2, 2016

Elkhart Truth
421 South Second Street
PO Box 487
Elkhart, IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Forest River, Inc., Elkhart 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 June 6, 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) Renewal
Permit Number: 039-36976-00295

Enclosure
PN Newspaper.dot 8/27/2015



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 3, 2016

To: Wakarusa 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: Forest River, Inc.
Permit Number: 039-36976-00295

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 2/16/2016



Indiana Department of Environmental Management

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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

Notice of Public Comment

June 3, 2016
Forest River, Inc.
039-36976-00295

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 6/3/2016 Forest River, Inc. - Elkhart 039-36976-00295 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		William G. Conway Forest River, Inc. - Elkhart PO Box 3030 Elkhart IN 46515-3030 (Source CAATS)										
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
5		Wakarusa-Olive and Harrison Township 124 N Elkhart St. Box 485 Wakarusa IN 46573-0485 (Library)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Mr. Bill MacDonald DECA Environmental & Associates, Inc.. 410 1st Avenue North East Carmel IN 46032 (Consultant)										
8												
9												
10												
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12												
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15												

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