



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 a New Source Review and Minor Source Operating Permit (MSOP)

The Indiana Department of Environmental Management (IDEM) has received an application from Heartland Recreational Vehicles LLC, located at 7805 State Road 9 & 160 W 750 North, Howe, IN 46746, for a new source review and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Heartland Recreational Vehicles LLC to operate a new stationary recreational vehicle manufacturing facility.

IDEM is aware that the stationary recreational vehicle manufacturing facility has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

LaGrange County Library
203 West Spring St
LaGrange, IN 46761

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 M 087-37017-00684 in all correspondence.

Comments should be sent to:

Kelsey Bonhivert
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-1782
Or dial directly: (317) 233-1782
Fax: (317) 232-6749 attn: Kelsey Bonhivert
E-mail: KBonhive@idem.IN.gov

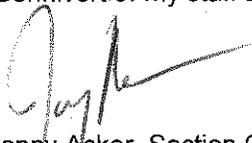
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



Michael R. Pence
Governor

DRAFT

Carol S. Comer
Commissioner

New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

Heartland Recreational Vehicles LLC
7805 N State Road 9 & 160 W 750 North
Howe, Indiana 46746

(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.: M087-37017-00684	
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 recreational vehicle manufacturing plant.

Source Address:	7805 N State Road 9 & 160 W 750 North, Howe, Indiana 46746
General Source Phone Number:	(250) 562-3500
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition

This stationary recreational vehicle manufacturing source consists of the following two (2) plants:

- (a) Plant 201 is located at 7805 N State Road 9, Howe, Indiana 46746; and
- (b) Plant 203 is located at 160 W 750 North, Howe, Indiana 46746

Since these two (2) plants are located on adjacent properties, have the same major SIC code of 37, and are under common control, they will be considered one (1) source, as defined by 326 IAC2-7-1(22).

A.3 Emission Units and Pollution Control Equipment Summary

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

Plant 201 - 7805 N State Road 9

- (a) Plant 201 RV Line:
 - (1) One (1) surface coating and assembly operation, identified as P201 Assembly, constructed in 2005, with a maximum capacity of 2.5 units/hour, and exhausting indoors.
 - (2) One (1) finishing operation, identified as P201 Final Finish, constructed in 2005, with a maximum capacity of 2.5 units/hour, and exhausting indoors.
- (b) One (1) lamination operation, identified as P201 Lamination, constructed in 2005, with a maximum capacity of 6.25 units/hour, and exhausting indoors.
- (c) Eighteen (18) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (1) Seven (7) natural gas-fired heaters, identified as H1-201 through H7-201, installed in 2005, with a maximum heat input capacity of 0.15 MMBtu/hour each, and exhausting to vents SVH1-201 through SVH7-201, respectively.
 - (2) Ten (10) natural gas-fired radiant tube heaters, identified as H8-201 through H17-201, installed in 2005, with a maximum heat input capacity of 0.15 MMBtu/hour each, and exhausting to vents SVH8-201 through SVH17-201, respectively.
 - (3) One (1) natural gas-fired forced air heater, identified as H18-201, installed in 2005, with a maximum heat input capacity of 0.50 MMBtu/hour, and exhausting to vent SVH18-201.
- (d) One (1) Woodworking and material cutting operation, identified as WWP201, constructed in 2005, equipped with no controls, and exhausting indoors, including:
- (1) Nineteen (19) chop saws, used for cutting pipes, with a maximum capacity of 10 cuts/hour.
 - (2) Two (2) drill presses, with a maximum capacity of 2.5 pieces/hour.
 - (3) Eighteen (18) hand routers, used for edge trimming, with a maximum capacity of 120 feet/hour.
- (f) One (1) welding operation, identified as WldP201, constructed in 2005, containing four (4) Aluminum MIG welders, each with a maximum electrode consumption of 4.50 lbs/hour, and exhausting indoors.

Plant 203 - 160 W 750 North

- (e) Plant 203 RV Line:
- (1) One (1) surface coating and assembly operation, identified as P203 Assembly, constructed in 2000, with a maximum capacity of 1.0 units/hour, and exhausting indoors.
 - (2) One (1) finishing operation, identified as P203 Final Finish, constructed in 2000, with a maximum capacity of 1.0 units/hour, and exhausting indoors.
- (f) Twelve (12) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
- (1) Three (3) natural gas-fired thermocyclers, identified as H1-203 through H3-203, installed in 2000, with a maximum heat input capacity of 0.58 MMBtu/hour each, and exhausting to vents SVH1-203 through SVH3-203, respectively.
 - (2) Nine (9) natural gas-fired heaters, identified as H4-203 through H12-203, installed in 2000, with a maximum heat input capacity of 0.08 MMBtu/hour each, and exhausting to vents SVH4-203 through SVH12-203, respectively.
- (g) One (1) Woodworking and material cutting operation, identified as WWP203, constructed in 2000, equipped with no controls, and exhausting indoors, including:
- (1) Twelve (12) chop saws, used for cutting pipes, with a maximum capacity of 10 cuts/hour.

- (2) Four (4) drill presses, with a maximum capacity of 2.5 pieces/hour.
- (3) Eighteen (18) hand routers, used for edge trimming, with a maximum capacity of 120 feet/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 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

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

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

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

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

- (a) This permit, M087-37017-00684, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M087-37017-00684 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.16 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 201 - 7805 N State Road 9

(a) Plant 201 RV Line:

- (1) One (1) surface coating and assembly operation, identified as P201 Assembly, constructed in 2005, with a maximum capacity of 2.5 units/hour, and exhausting indoors.
- (2) One (1) finishing operation, identified as P201 Final Finish, constructed in 2005, with a maximum capacity of 2.5 units/hour, 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.1.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 (BACT) not applicable, the VOC input to the P201 Assembly and P201 Final Finish operations shall be less than twenty-five (25) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)) not applicable to P201 Assembly and P201 Final Finish.

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

D.1.3 Record Keeping Requirement

- (a) In order to document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month and each compliance period.

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

D.1.4 Reporting Requirement

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

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:	Heartland recreational Vehicles LLC
Address:	7805 N State Road 9 & 160 W 750 North
City:	Howe, Indiana 46746
Phone #:	(250) 562-3500
MSOP #:	M087-37017-00684

I hereby certify that Heartland recreational Vehicles LLC is still in operation.
 no longer in operation.
I hereby certify that Heartland recreational Vehicles LLC is in compliance with the requirements of
MSOP M087-37017-00684.
 not in compliance with the requirements of
MSOP M087-37017-00684.

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:

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

Quarterly Report

Source Name: Heartland recreational Vehicles LLC
Source Address: 7805 N State Road 9 & 0160 W 750 North
Howe, Indiana 46746
MSOP Permit No.: M087-37017-00684
Facility: P201 RV Surface Coating: P201 Assembly and P201 Final Finish
Parameter: VOC Emissions
Limit: VOC emissions from P201 RV Surface Coating, including P201 Assembly and P201 Final Finish, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Heartland recreational Vehicles LLC
7805 N State Road 9 & 0160 W 750 North
Howe, Indiana 46746

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Heartland recreational Vehicles LLC 7805 N State Road 9 & 0160 W 750 North, Howe, Indiana 46746, has constructed and will operate a recreational vehicle manufacturing plant on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on **Reviewer: Insert date application received at IDEM** and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M087-37017-00684, Plant ID No. 087-00684 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

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

Source Description and Location

Source Name: Heartland Recreational Vehicles LLC
Source Location: 7805 N. State Road 9, Howe, IN 46746
County: LaGrange
SIC Code: 3792 (Travel Trailers and Campers)
Operation Permit No.: 087-37017-00684
Permit Reviewer: Kelsey Bonhivert

On March 30, 2016, the Office of Air Quality (OAQ) received an application from heartland Recreational Vehicles LLC related to the operation of an existing stationary recreational vehicle manufacturing plant.

Source Definition

This source consists of the following plants:

- (a) Plant 1 - Cruiser Plant 201 is located at 7805 N. State Road 9, Howe, IN 46746
- (b) Plant 2 - DRV Plant 203 is located at 160 W. 750 North, Howe, IN 46746

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These plants are located on adjacent properties, have the same SIC code of 3792 and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(73).

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.

Pollutant	Designation
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
LaGrange County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
LaGrange County has been classified as attainment or unclassifiable in Indiana for CO, NO_x, PM₁₀, SO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Heartland Recreational Vehicles LLC on March 30, 2016, relating to the acquisition of two existing recreational vehicle manufacturing plants. This source did not previously obtain an operating permit, and based on the potential to emit of this source, Heartland Recreational Vehicles LLC will be issued an MSOP.

Unpermitted Emission Units and Pollution Control Equipment

Plant 201 - 7805 N State Road 9

- (a) **Plant 201 RV Line:**
 - (1) One (1) surface coating and assembly operation, identified as P201 Assembly, constructed in 2005, with a maximum capacity of 2.5 units/hour, and exhausting indoors.
 - (2) One (1) finishing operation, identified as P201 Final Finish, constructed in 2005, with a maximum capacity of 2.5 units/hour, and exhausting indoors.
- (b) One (1) lamination operation, identified as P201 Lamination, constructed in 2005, with a maximum capacity of 6.25 units/hour, and exhausting indoors.

- (c) Eighteen (18) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) Seven (7) natural gas-fired heaters, identified as H1-201 through H7-201, installed in 2005, with a maximum heat input capacity of 0.15 MMBtu/hour each, and exhausting to vents SVH1-201 through SVH7-201, respectively.
 - (2) Ten (10) natural gas-fired radiant tube heaters, identified as H8-201 through H17-201, installed in 2005, with a maximum heat input capacity of 0.15 MMBtu/hour each, and exhausting to vents SVH8-201 through SVH17-201, respectively.
 - (3) One (1) natural gas-fired forced air heater, identified as H18-201, installed in 2005, with a maximum heat input capacity of 0.50 MMBtu/hour, and exhausting to vent SVH18-201.
- (d) One (1) Woodworking and material cutting operation, identified as WWP201, constructed in 2005, equipped with no controls, and exhausting indoors, including:
 - (1) Nineteen (19) chop saws, used for cutting pipes, with a maximum capacity of 10 cuts/hour.
 - (2) Two (2) drill presses, with a maximum capacity of 2.5 pieces/hour.
 - (3) Eighteen (18) hand routers, used for edge trimming, with a maximum capacity of 120 feet/hour.
- (f) One (1) welding operation, identified as WldP201, constructed in 2005, containing four (4) Aluminum MIG welders, each with a maximum electrode consumption of 4.50 lbs/hour, and exhausting indoors.

Plant 203 - 160 W 750 North

- (e) Plant 203 RV Line:
 - (1) One (1) surface coating and assembly operation, identified as P203 Assembly, constructed in 2000, with a maximum capacity of 1.0 units/hour, and exhausting indoors.
 - (2) One (1) finishing operation, identified as P203 Final Finish, constructed in 2000, with a maximum capacity of 1.0 units/hour, and exhausting indoors.
- (f) Twelve (12) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) Three (3) natural gas-fired thermocyclers, identified as H1-203 through H3-203, installed in 2000, with a maximum heat input capacity of 0.58 MMBtu/hour each, and exhausting to vents SVH1-203 through SVH3-203, respectively.
 - (2) Nine (9) natural gas-fired heaters, identified as H4-203 through H12-203, installed in 2000, with a maximum heat input capacity of 0.08 MMBtu/hour each, and exhausting to vents SVH4-203 through SVH12-203, respectively.
- (g) One (1) Woodworking and material cutting operation, identified as WWP203, constructed in 2000, equipped with no controls, and exhausting indoors, including:
 - (1) Twelve (12) chop saws, used for cutting pipes, with a maximum capacity of 10 cuts/hour.

- (2) Four (4) drill presses, with a maximum capacity of 2.5 pieces/hour.
- (3) Eighteen (18) hand routers, used for edge trimming, with a maximum capacity of 120 feet/hour.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	Less than 25
PM10 ⁽¹⁾	Less than 25
PM2.5	Less than 25
SO ₂	Less than 25
NO _x	Less than 25
VOC	Greater than 25, less than 100
CO	Less than 25

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

HAPs	Potential To Emit (tons/year)
Benzene	Less than 10
Dichlorobenzene	Less than 10
Formaldehyde	Less than 10
Hexane	Less than 10
Methylene diphenyl diisocyanate	Less than 10
Toluene	Less than 10
Xylene	Less than 10
Metals	Less than 10
TOTAL HAPs	Less than 25

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

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations 40 CFR 60, Subpart HH (326 IAC 12), are not included in the permit, since this source does not perform surface coating on neither automobiles or light duty trucks
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobile and Light-Duty Trucks, Subpart IIII are not included in the permit. The source is not an automobile or light-duty truck manufacturing plant.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM are not included in the permit because the source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, Subpart PPPP are not included in this permit because the source is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, Subpart XXXXXX are not included in this permit, because this source's SIC is not listed.
- (f) This requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH, are not included in the permit for this source for the following reasons:
- (1) The source does not have any paint stripping operations.
 - (2) The source does not perform in spray application of coatings to motor vehicles or mobile equipment. 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..
 - (3) The source does perform spray application of coatings to plastic and /or metal substrates. However, 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.

Therefore, the source is not subject to 40 CFR 63, Subpart HHHHHH.

- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
(1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
(2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

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

State Rule Applicability – Individual Facilities

Woodworking and Material Cutting Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(4), woodworking and material operation WWP201 is exempt from the requirements of 326 IAC 6-3-2 because the PTE of particulates is less than 0.551 lbs/hour.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(4), woodworking and material operation WWP203 is exempt from the requirements of 326 IAC 6-3-2 because the PTE of particulates is less than 0.551 lbs/hour.
- (c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), welding and thermal cutting operation WldP201 is exempt from the requirements of 326 IAC 6-3-2 because less than 625 pounds of rod or wire is consumed per day.

Surface Coating

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

P201 Lamination:

P201 Lamination uses flow coating. Pursuant to 326 IAC 6-3-2(b)(5) - (8), surface coating operations using dip, roll, flow, and brush coatings are exempt from the requirements of 326 IAC 6-3-2. . Therefore, the requirements of 326 IAC 6-3-2 do not apply to the P201 Lamination surface coating operation.

P201 and P203 Assembly:

- (1) P201 Assembly and P203 Assembly use caulk and brush application. Pursuant to 326 IAC 6-3-2(b)(5) - (8), surface coating operations using dip, roll, flow, and brush coatings are exempt from the requirements of 326 IAC 6-3-2.
- (2) IDEM, OAQ has determined that application of SP90 Big Sticky adhesive in RV assembly operations at this source, when using non-atomizing HVLP spray guns, does not have the potential to emit particulate emissions. This adhesive is applied as a sticky, stretchy, stringy, web-like material (in this case). Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.

IDEM, OAS has determined that the application of Royal DC1309 in RV assembly operations at this source, when using non-atomizing HVLP spray guns, does not have the potential to emit particulate emissions. This adhesive is applied as a sticky, stretchy, stringy, web-like material (in this case). Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.

The above determinations were based on visual observations made by IDEM, OAQ staff.

- (3) P201 and P203 Assembly surface coating each use less than use less than five (5) gallons per day when using HVLP spray coating. Pursuant to 326 IAC 6-3-2(b)(15), surface coating processes not otherwise exempted under 326 IAC 6-3-2(b)(5) - (8) that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3-2..

Therefore, the requirements of 326 IAC 6-3-2 do not apply to P201 and P203 Assembly surface coating operations.

P201 and P203 Final Finish:

- (1) P201 Final Finish and P203 Final Finish operations use hand wipe application, which doesn't have a potential to emit particulate emissions. Therefore, this operation does not meet the definition of "surface coating" or under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.
- (2) P201 and P203 Final Finish surface coating each use less than five (5) gallons per day when using HVLP spray coating. Pursuant to 326 IAC 6-3-2(b)(15), surface coating processes not otherwise exempted under 326 IAC 6-3-2(b)(5) - (8) that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3-2..

Therefore, the requirements of 326 IAC 6-3-2 do not apply to P201 and P203 Final Finish surface coating operations.

- (e) 326 IAC 8-1-6 (New facilities; general reduction requirements)
The P201 RV surface coating line, which includes P201 Assembly and P201 Final Finish, has potential emissions more than 25 tons per year and is not otherwise regulated by other provisions of the article, 326 IAC 20-48, or 326 IAC 20-56. In order to render the requirements of 326 IAC 8-1-6 no applicable, the VOC emissions from the P201 surface coating line shall not exceed 24.9 tons per twelve (12) consecutive month period, including coatings that coat plastic parts, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from the P201 RV surface coating line and shall render the requirements of 326 IAC 8-1-6 not applicable.

- (f) 326 IAC 8-2 (Surface Coating Emission Limitations)
P201 Lamination, P201 Final Finish, and P203 Final Finish each have potential to emit VOC less than 15 pounds/day. Therefore, pursuant to 326 IAC 8-1-1(b), these facilities are exempted from the requirements of 326 IAC 8.
- (g) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts)
Pursuant to 326 IAC 8-2-9, the two (2) assembly lines P201 Assembly and P203 Assembly and the two (2) final finish lines P201 Final Finish and P203 Final Finish, are exempt from the requirements of 326 IAC 8-2-9, because the surface coating operations were constructed after July 1, 1990 and have actual VOC emissions of less than fifteen (15) pounds of VOC per day, when coating metal.
- (h) 326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)
The two (2) assembly lines P201 Assembly and P203 Assembly do not perform surface coating of wood furniture or cabinets. Therefore the requirements of 326 IAC 8-2-12 are not applicable this source.

Natural Gas Fired Combustion

- (i) 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The gas-fired heating units are not subject to 326 IAC 6-2-1, since they are not sources of indirect heating.
- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired heating units are exempt from the requirements of 326 IAC 6-3-2, because,

pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Compliance Determination, Monitoring and Testing Requirements

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

In order to render 326 IAC 8-1-6 not applicable when surface coating, the use of VOC including coatings that coat plastic, metal, and wood, dilution solvents, and cleaning solvents, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the VOC usage for the P201 RV Line shall be determined pursuant to 326 IAC 8-1-4(a)(3) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) There are no monitoring and testing requirements.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 30, 2016.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 087-37017-00684. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Kelsey Bonhivert at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
PTE Summary**

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

Uncontrolled Potential to Emit (tons/yr)								
	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Plant 201 Emission Units								
P201 Assembly	0.00	0.00	0.00	--	--	26.81	--	5.84
P201 Final Finish	0.02	0.02	0.02	--	--	0.81	--	1.20E-02
P201 Lamination	--	--	--	--	--	2.77E-04	--	2.77E-04
Natural Gas Combustion	0.02	0.10	0.10	7.86E-03	1.31	0.07	1.10	0.02
Woodworking WWP201	0.64	0.64	0.64	--	--	--	--	--
Welding WldP201	0.41	0.41	0.41	--	--	--	--	0.25
Plant 203 Emission Units								
P203 Assembly	0.00	0.00	0.00	--	--	14.77	--	2.96
P203 Final Finish	0.01	0.01	0.01	--	--	0.32	--	4.78E-03
Natural Gas Combustion	0.02	0.08	0.08	6.34E-03	1.06	0.06	0.89	0.02
Woodworking WWP203	0.47	0.47	0.47	--	--	--	--	--
Fugitives								
Paved Roads	0.11	0.02	0.01	--	--	--	--	--
Total	1.70	1.75	1.73	1.42E-02	2.37	42.84	1.99	9.11

* PM2.5 listed is direct PM2.5

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Surface Coating Operations
P201**

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

P201 Assembly

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 per 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)	Application Method*	Substrate	Transfer Efficiency
Geocel 2300	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.1880	2.50	11.280	0.41	0.39	0.19	4.44	0.81	0.00	Manual	Metal/Plastic	100%
Geocel Pro Seal	11.95	1.00%	0.00%	1.00%	0.00%	98.38%	0.1880	2.50	11.280	0.12	0.12	0.06	1.35	0.25	0.00	Manual	Metal/Plastic	100%
Royal DC13039 Adhesive	5.90	77.20%	0.00%	77.20%	0.00%	22.80%	0.0990	2.50	5.940	4.55	4.55	1.13	27.06	4.94	0.00	Non-atomizing**	Wood/Fabric	100%
Sikaflex 252 Sealant	9.80	6.50%	0.00%	6.50%	0.00%	93.50%	0.0990	2.50	5.940	0.64	0.64	0.16	3.78	0.69	0.00	Manual	Wood/Fabric	100%
Alpha Systems 1016 Sealant	9.01	34.00%	0.00%	34.00%	0.00%	56.00%	0.1270	2.50	7.620	3.06	3.06	0.97	23.34	4.26	0.00	Manual	Wood/Fabric	100%
Dicor 502 LSW Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	55.20%	0.1270	2.50	7.620	3.03	2.93	0.93	22.30	4.07	0.00	Manual	Wood/Fabric	100%
Sta'Put SP90 Big Sticky	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	0.4000	2.50	24.000	3.25	2.59	2.59	62.16	11.34	0.00	Non-atomizing**	Wood/Fabric	100%
Oatey 30915 ABS Adhesive	7.34	30.00%	30.00%	45.00%	26.40%	25.20%	0.0125	2.50	0.750	4.49	3.30	0.10	2.48	0.45	0.00	Manual	Plastic	100%

Total Gallons Used (gal/day) 74.43 **Total Potential to Emit** **146.91** **26.81** **0.00**

P201 Final Finish

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 per 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)	Application Method*	Substrate	Transfer Efficiency
Diamond Vogel KB9510 Paint	8.60	75.98%	71.00%	4.98%	0.00%	24.00%	0.0012	2.500	0.072	0.43	0.43	0.00	0.03	0.01	0.01	HVLP	Metal/Plastic	65%
Raabe 604 Paint	8.60	83.26%	10.55%	72.71%	0.00%	24.00%	0.0012	2.500	0.072	6.25	6.25	0.02	0.45	0.08	0.01	HVLP	Metal/Plastic	65%
PPG 175438 Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	0.0002	2.500	0.012	7.93	5.08	0.00	0.06	0.01	0.00	Manual	Solvent/Cleaner	100%
TCI Acetone	6.59	100.00%	100.00%	0.00%	100.00%	100.00%	0.0023	2.500	0.138	0.00	0.00	0.00	0.00	0.00	0.00	Manual	Solvent/Cleaner	100%
TCI Isopropyl Alcohol	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0049	2.500	0.294	6.59	6.59	0.08	1.94	0.35	0.00	Manual	Solvent/Cleaner	100%
TCI Mineral Spirits	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0049	2.500	0.294	6.59	6.59	0.08	1.94	0.35	0.00	Manual	Solvent/Cleaner	100%

Total Gallons Used (gal/day) 0.88 **Total Potential to Emit** **0.18** **4.42** **0.81** **0.02**

Total subject to 326 IAC 6-3-2 0.14 **Total PTE:** 151.33 27.62

Total when coating metal: 6.27 1.14 Exempt from 326 IAC 8-2-9

Notes

*Manual application consists of either caulk tube, brush, roll, or hand-wipe

**This adhesive is applied as a sticky, stretchy, stringy, web-like material (in this case). Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.

METHODLOGY

- 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
Hazardous Air Pollutants (HAPs), VOC
From Surface Coating Operations
P201**

**Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert**

P201 Assembly

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Tetrachloro ethylene	Weight % Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Tetrachloro- ethylene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)
Geocel 2300	9.85	0.1880	2.50	1.34%	4.00%	0.00%	0.00%	0.27	0.81	0.00	0.00
Geocel Pro Seal	11.95	0.1880	2.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Royal DC13039 Adhesive	5.90	0.0990	2.50	0.00%	0.00%	0.00%	12.70%	0.00	0.00	0.00	0.81
Sikaflex 252 Sealant	9.80	0.0990	2.50	4.50%	0.00%	0.00%	0.00%	0.48	0.00	0.00	0.00
Alpha Systems 1016 Sealant	9.01	0.1270	2.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Dicor 502 LSW Adhesive/Sealant	9.92	0.1270	2.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Sta'Put SP90 Big Sticky	6.08	0.4000	2.50	0.00%	0.00%	0.00%	13.00%	0.00	0.00	0.00	3.46
Oatey 30915 ABS Adhesive	7.34	0.0125	2.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total Potential Emissions								0.75	0.81	0.00	4.27
Total HAP								5.84			

P201 Final Finish

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehy de Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Diamond Vogel KB9510 Paint	8.6	0.0012	2.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Raabe 604 Paint	8.6	0.0012	2.500	1.00%	9.00%	0.00%	0.28%	1.13E-03	1.02E-02	0.00	3.16E-04
PPG 175438 Thinner	7.26	0.0002	2.500	1.00%	1.00%	0.01%	0.10%	1.59E-04	1.59E-04	1.59E-06	1.59E-05
TCI Acetone	6.59	0.0023	2.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
TCI Isopropyl Alcohol	6.59	0.0049	2.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
TCI Mineral Spirits	6.59	0.0049	2.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total Potential Emissions								1.29E-03	1.03E-02	1.59E-06	3.32E-04
Total HAP								1.20E-02			

P203 Total HAPs	5.85
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Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs), VOC, and Particulate Emissions
From Surface Coating Operations
P201 Lamination

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

Material	Density lb/gallon	Gallons of Material/unit	Weight % MDI	Maximum unit/hour	Coverage/unit ft2	Application Method
Hinkel Adhesive	10.01	0.35	10.00%	3.5	750	Flowcoat

Assume all VOC is MDI

PTE VOC/HAP = 2.77E-04 tons/year

Evaporation Rate W =	(25.4*1.3X10E-09 * (250.26/298) * (0.508)^0.78 * 10451.59 * 5
=	4.78E-04 grams/minute
=	6.32E-05 lbs/hour

Vapor pressure of MDI at 298.2 K is 1.0x10-5 mmHg

$$\text{VPMDI of 10.00\% MDI @ 298.2K} = (1.0 \times 10^{-5} \text{ mmHg}) \times (1 \text{ atm} / 760 \text{ mmHg}) \times (10 \text{ lbs MDI} / 100 \text{ lbs Mixture})$$

$$= 1.3 \times 10^{-9} \text{ atm}$$

Process Temperature (Tproc) =	77.0 F
=	(77 F + 459.67) * 5/9
=	298 K

Surface Area=	750	ft2/unit
Area Coated/Day	750ft2/unit x 3.5 unit/hour x 24 hour/day	
=	63,000.00	ft2/day
=	5852.892	m2/day

Molecular Weight (Mw) MDI =	250.26	gram/mol
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Tack-free time (tTF) =	5	sec
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Airflow (u) =	100	feet/min
=	0.508	m/sec

Note:

MDI = Methylene diphenyl diisocyanate, CAS Np. 9016-87-9

METHODOLOGY

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

The evaporation rate was determined using an equation developed by the Center for the Polyurethane Industry:

ESTIMATING MDI EMISSIONS FOR SECTION 313 OF EPCRA REPORTING, MAY 2012.

This reference was used to determine the evaporation rate for a similar lamination process located at Forest River, Inc. Millersburg facility (OAQ Permit #039-26183-00471, issued July 8, 2008).

$$W = 25.4 * VPMDI * (Mw / Tproc) * (u)^{0.78} * SA * tTF$$

Where:

W = the evaporation losses from the open process in gram/day

VPMDI = the vapor pressure of MDI in atmospheres @ process temperature

Tproc = the process temperature in K

Mw = the molecular weight of MDI

u = the airflow speed in m/sec

SA = the exposed surface area in M2

tTF = the tack-free time in seconds

**Appendix A: Emissions Calculations
 Hazardous Air Pollutants (HAPs), VOC, and Particulate Emissions
 From Surface Coating Operations
 P203**

**Company Name: Heartland Recreational Vehicles LLC
 Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
 Permit Number: 087-37017-00684
 Reviewer: Kelsey Bonhivert**

P203 Assembly

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 per 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)	Application Method	Substrate	Transfer Efficiency	
Geocel 2300	9.85	8.00%	4.00%	4.00%	4.72%	89.29%	0.1870	1.000	4.488	0.41	0.39	0.07	1.77	0.32	0.00	Manual	Metal/Plastic	100%	
Geocel Pro Seal	11.95	1.00%	0.00%	1.00%	0.00%	98.38%	0.1250	1.000	3.000	0.12	0.12	0.01	0.36	0.07	0.00	Manual	Metal/Plastic	100%	
Royal DC13039 Adhesive	5.90	77.20%	0.00%	77.20%	0.00%	22.80%	0.1250	1.000	3.000	4.55	4.55	0.57	13.66	2.49	0.00	Non-atomizing**	Wood/Fabric	100%	
Sikaflex 252 Sealant	9.80	6.50%	0.00%	6.50%	0.00%	93.50%	0.1990	1.000	4.776	0.64	0.64	0.13	3.04	0.56	0.00	Manual	Wood/Fabric	100%	
Alpha Systems 1016 Sealant	9.01	34.00%	0.00%	34.00%	0.00%	56.00%	0.1560	1.000	3.744	3.06	3.06	0.48	11.47	2.09	0.00	Manual	Wood/Fabric	100%	
Dicor 502 LSW Adhesive/Sealant	9.92	32.50%	3.00%	29.50%	3.57%	55.20%	0.2500	1.000	6.000	3.03	2.93	0.73	17.56	3.20	0.00	Manual	Wood/Fabric	100%	
StaPut SP90 Big Sticky	6.08	70.30%	27.70%	42.60%	20.19%	41.93%	0.5000	1.000	12.000	3.25	2.59	1.30	31.08	5.67	0.00	Non-atomizing**	Wood/Fabric	100%	
Oatey 30915 ABS Adhesive	7.34	30.00%	30.00%	45.00%	26.40%	25.20%	0.0249	1.000	0.598	4.49	3.30	0.08	1.97	0.36	0.00	Manual	Plastic	100%	
Total Gallons Used (gal/day)									37.606	Total Potential to Emit			3.37	80.92	14.77	0.00			

P203 Final Finish

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 per 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)	Application Method	Substrate	Transfer Efficiency	
Diamond Vogel KB9510 Paint	8.60	75.98%	71.00%	4.98%	0.00%	24.00%	0.0012	1.000	0.029	0.43	0.43	0.00	0.01	0.00	0.00	HVLP	Metal/Plastic	65%	
Raabe 604 Paint	8.60	83.26%	10.55%	72.71%	0.00%	24.00%	0.0012	1.000	0.029	6.25	6.25	0.01	0.18	0.03	0.00	HVLP	Metal/Plastic	65%	
PPG 175438 Thinner	7.26	100.00%	30.00%	70.00%	35.94%	28.00%	0.0002	1.000	0.005	7.93	5.08	0.00	0.02	0.00	0.00	Hand-wipe	Solvent/Clean	100%	
TCI Acetone	6.59	100.00%	100.00%	0.00%	100.00%	100.00%	0.0023	1.000	0.055	0.00	0.00	0.00	0.00	0.00	0.00	Hand-wipe	Solvent/Clean	100%	
TCI Isopropyl Alcohol	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0049	1.000	0.118	6.59	6.59	0.03	0.77	0.14	0.00	Hand-wipe	Solvent/Clean	100%	
TCI Mineral Spirits	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0049	1.000	0.118	6.59	6.59	0.03	0.77	0.14	0.00	Hand-wipe	Solvent/Clean	100%	
Total Gallons Used (gal/day)									0.353	Total Potential to Emit			0.07	1.77	0.32	0.01			

Total subject to 6-3-2

0.06

Total PTE:

82.68 15.09

Total when coating metal:

2.32 0.42

Exempt from 326 IAC 8-2-9

Notes

*Manual application consists of either caulk tube, brush, roll, or hand-wipe

**This adhesive is applied as a sticky, stretchy, stringy, web-like material (in this case). Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.

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
Hazardous Air Pollutants (HAPs), VOC, and Particulate Emissions
From Surface Coating Operations
P203

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

P203 Assembly

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Tetrachloro- ethylene	Weight % Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Tetrachloro- ethylene (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)
Geocel 2300	9.85	0.1870	1.00	1.34%	4.00%	0.00%	0.00%	0.11	0.32	0.00	0.00
Geocel Pro Seal	11.95	0.1250	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Royal DC13039 Adhesive	5.90	0.1250	1.00	0.00%	0.00%	0.00%	12.70%	0.00	0.00	0.00	0.41
Sikaflex 252 Sealant	9.80	0.1990	1.00	4.50%	0.00%	0.00%	0.00%	0.38	0.00	0.00	0.00
Alpha Systems 1016 Sealant	9.01	0.1560	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Dicor 502 LSW Adhesive/Seal	9.92	0.2500	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Sta'Put SP90 Big Sticky	6.08	0.5000	1.00	0.00%	0.00%	0.00%	13.00%	0.00	0.00	0.00	1.73
Oatey 30915 ABS Adhesive	7.34	0.0249	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total Potential Emissions								0.49	0.32	0.00	2.14
Total HAP								2.96			

P203 Final Finish

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Diamond Vogel KB9510 Paint	8.60	0.0012	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Raabe 604 Paint	8.60	0.0012	1.00	1.00%	9.00%	0.00%	0.28%	4.52E-04	4.07E-03	0.00	1.27E-04
PPG 175438 Thinner	7.26	0.0002	1.00	1.00%	1.00%	0.01%	0.10%	6.36E-05	6.36E-05	6.36E-07	6.36E-06
TCI Acetone	6.59	0.0023	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
TCI Isoporopyl Alcohol	6.59	0.0049	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
TCI Mineral Spirits	6.59	0.0049	1.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total Potential Emissions								5.16E-04	4.13E-03	6.36E-07	1.33E-04
Total HAP								4.78E-03			

P203 Total HAPs	2.96
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METHODOLOGY

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
P201**

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

Units	Number	Heat input capacity (MMBtu/hr)	Total (MMBtu/hr)
Heater H1-201 through H7-201	7	0.15	1.05
Radiant tube heaters H8-201 through H17-201	10	0.15	1.5
Forced air heater H18-201	1	0.5	0.5

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.1	1020	26.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.10	0.10	0.01	1.31	0.07	1.10

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

Methodology

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzen	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.8E-05	1.6E-05	9.8E-04	0.02	4.5E-05	0.02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.5E-06	1.4E-05	1.8E-05	5.0E-06	2.8E-05	7.2E-05
					Total HAPs	0.02
					Worst HAP	0.02

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
P203**

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

Units	Number	Heat input capacity (MMBtu/hr)	Total (MMBtu/hr)
Thermocycler H1-203 through H3-203	3	0.58	1.74
Heaters H4-203 through H12-203	9	0.08	0.72

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.5	1020	21.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.06	0.06	0.89

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

Methodology

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.2E-05	1.3E-05	7.9E-04	0.02	3.6E-05	0.02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	5.3E-06	1.2E-05	1.5E-05	4.0E-06	2.2E-05	5.8E-05
					Total HAPs	0.02
					Worst HAP	0.02

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

Appendix A: Emissions Calculations
 Woodworking and Material Cutting
 WWP201

Company Name: Heartland Recreational Vehicles LLC
 Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
 Permit Number: 087-37017-00684
 Reviewer: Kelsey Bonhivert

<u>Nineteen (19) Chop Saws</u>																
10	cuts/hour	x	4	inch diameter nine	x	3.14	pi	x	0.125	in thick pipe wall	x	0.125	in thick blade	=	1.96	in3 loss/hour
1.96	in3 loss/hour	÷	1728	in3/ft3	x	87.71	lb/ft3	=	0.10	lb loss/hour						

<u>Two (2) Drill Presses</u>																
10	BF/hour	÷	4	BF/piece	=	2.5	pieces/hour									
2.5	pieces/hour	x	6	holes/piece	x	3.14	pi	x	0.0156	r^2	x	1.5	in depth	=	1.10	in3 loss/hour
1.1	in3 loss/hour	÷	1728	in3/ft3	x	40	lb/ft3	=	0.03	lb loss/hour						

<u>Eighteen (18) Hand Routers</u>																
120	feet/hour	x	0.125	inch wide bit	x	0.06	inch depth	=	0.90	in3 loss/hour						
0.9	in3 loss/hour	÷	1728	in3/ft3	x	40	lb/ft3	=	0.02	lb loss/hour						

Total Loss 0.15 lb/hour
PM Emissions 0.64 ton/year

**Appendix A: Emissions Calculations
Woodworking and Material Cutting
WWP203**

Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert

<u>Twelve (12) Chop Saws</u>													
10	cuts/hour	x	4	inch long	x	0.125	in thick pipe wall	x	0.125	in thick blade	=	0.63	in3 loss/hour
0.63	in3 loss/hour	÷	1728	in3/ft3	x	168.43	lb/ft3	=	0.06	lb loss/hour			

<u>Four (4) Drill Presses</u>													
10	BF/hour	÷	4	BF/piece	=	2.5	pieces/hour						
2.5	pieces/hour	x	6	holes/piece	x	3.14	pi	x	0.0156	r ²	x	1.5	in depth = 1.10 in3 loss/hour
1.1	in3 loss/hour	÷	1728	in3/ft3	x	40	lb/ft3	=	0.03	lb loss/hour			

<u>Eighteen (18) Hand Routers</u>													
120	feet/hour	x	0.125	inch wide bit	x	0.06	inch depth	=	0.90	in3 loss/hour			
0.9	in3 loss/hour	÷	1728	in3/ft3	x	40	lb/ft3	=	0.02	lb loss/hour			

Total Loss 0.11 lb/hour
Annual Emissions 0.47 ton/year

Appendix A: Emissions Calculations

Welding and Thermal Cutting

WidP201

Company Name: Heartland Recreational Vehicles LLC

Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746

Permit Number: 087-37017-00684

Reviewer: Kelsey Bonhivert

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/PM2.5	Mn	Ni	Co	Cr	PM/PM10/PM2.5	Mn	Ni	Cr		
WELDING													
Metal Inert Gas (MIG)(carbon steel) E70S	4	4.5	0.0052	0.00318	0.00001	0.00001	0.00001	0.094	0.057	0.00018	0.00018	0.00018	0.058
EMISSION TOTALS													
Potential Emissions lbs/hr								0.09	0.06	0.00	0.00	0.00	0.06
Potential Emissions lbs/day								2.25	1.37	0.00	0.00	0.00	1.39
Potential Emissions tons/year								0.41	0.25	0.00	0.00	0.00	0.25

Methodology:

Emission Factors from AP-42 Chapter 12, Table 12.19-1 and Table 12.19-2

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

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

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads
Plant 201 and 203**

**Company Name: Heartland Recreational Vehicles LLC
Source Address: 7805 N. State Road 9 & 160 W. 750 North, Howe, IN 46746
Permit Number: 087-37017-00684
Reviewer: Kelsey Bonhivert**

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	5.0	1.0	5.0	12.0	60.0	300	0.057	0.3	103.7
Vehicle (leaving plant) (one-way trip)	5.0	1.0	5.0	12.0	60.0	300	0.057	0.3	103.7
Totals			10.0		120.0			0.6	207.4

Average Vehicle Weight Per Trip = $\frac{12.0}{1.0}$ tons/trip
Average Miles Per Trip = $\frac{0.06}{1.0}$ miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	12.0	12.0	12.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.097	0.219	0.0538	lb/mile
Mitigated Emission Factor, Eext =	1.003	0.201	0.0492	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Totals	0.11	0.02	0.01	0.10	0.02	0.01

Methodology

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

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



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 15, 2016

Mr. Jon Stallman
Heartland Recreational Vehicles LLC
PO Box 235
Howe, IN 46746

Re: Public Notice
Heartland Recreational Vehicles LLC
Permit Level: New Source Construction and
Minor Source Operating Permit (MSOP)
Permit Number: 087-37017-00684

Dear Mr. Stallman:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange News in LaGrange, Indiana publish the abbreviated version of the public notice no later than June 17, 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 LaGrange County Library, 203 West Spring Street in LaGrange, 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 Kelsey Bonhivert, 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 3-1782 or dial (317) 233-1782.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

June 13, 2016

LaGrange News
PO Box 148
LaGrange, IN 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Heartland Recreational Vehicles LLC, LaGrange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than June 17, 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: New Source Construction and Minor Source operating Permit (MSOP)
Permit Number: 087-37017-00684

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 15, 2016

To: LaGrange County 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: Heartland Recreational Vehicles LLOC
Permit Number: 087-37017-00684

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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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

June 15, 2016
Heartland Recreational Vehicles LLC
087-37017-00684

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 6/15/2016 Heartland Recreational Vehicles LLC 089-37017-00684 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Jon Stallman Heartland Recreational Vehicles LLC PO Box 235 Howe IN 46746 (Source CAATS)										
2		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
3		LaGrange Co Public Library 203 W Spring St Lagrange IN 46761-1899 (Library)										
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
7		Howe Hotels 43122 Crissman Ct Sterling Heights MI 48314 (Affected State)										
8		Ronald L. and Jane M. Kaufman Trust 7185 E. State Road 120 Howe IN 46746 (Affected Party)										
9		Lennard Ag Co. 450 W. 750 North Howe IN 46746 (Affected Party)										
10		Dennis O. Baker Trust 23756 Wilson Rd. Sturgis Mi 49091 (Affected Party)										
11		Donald and Karen Wallace 7980 North 050 East Howe IN 46746 (Affected Party)										
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