



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
Significant Revision to a
Minor Source Operating Permit (MSOP)

for Forest River, Inc. - Glaval Bus Division in Elkhart County

Significant Permit Revision No.: 039-37254-00126

The Indiana Department of Environmental Management (IDEM) has received an application from Forest River, Inc. - Glaval Bus Division, located at 55135 CR1, 914 CR1, and 902 CR1, Elkhart, IN 46514, for a significant revision of its MSOP issued on December 18, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Forest River, Inc. - Glaval Bus Division to make certain changes at its existing source. Forest River, Inc. - Glaval Bus Division has applied to construct and operate an RV assembly line, woodworking operations, and space heaters. This plant, identified as Plant 68, will be constructed and operated on adjacent property south of the existing Forest River, Inc. - Glaval Bus Division, and the two plants will operate as one source.

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

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

Elkhart Public Library
300 S 2nd St
Elkhart, IN 46516

and

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 039-37254-00126 in all correspondence.

Comments should be sent to:

Joshua Levering
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6543
Or dial directly: (317) 234-6543
Fax: (317) 232-6749 attn: Joshua Levering
E-mail: JLeverin@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 Joshua Levering or my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

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Michael R. Pence
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DRAFT

Carol S. Comer
Commissioner

William G. Conway, Jr.
Forest River, Inc. - Glaval Bus Division
P.O. Box 3030
Elkhart, IN 46515

Re: 039-37254-00126
Significant Revision to
M039-28511-00126

Dear William G. Conway, Jr.:

Forest River, Inc. - Glaval Bus Division was issued a Minor Source Operating Permit (MSOP) Renewal No. M039-28511-00126 on December 18, 2009 for a stationary bus, motor home, travel trailer, and trailer assembly source located at 55135 CR1, 914 CR1, and 902 CR1, Elkhart, IN 46514. On June 1, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate an RV assembly line, woodworking operations, and space heaters. This plant, identified as Plant 68, will be constructed and operated on adjacent property south of the existing Forest River, Inc. - Glaval Bus Division, and the two plants will operate as one source. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

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

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

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Joshua Levering of my staff at 317-234-6543 or 1-800-451-6027, and ask for extension 4-6543.

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA/jjl

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



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Forest River, Inc. - Glaval Bus Division
55135 CR 1, 914 CR 1, and 902 CR 1
Elkhart, Indiana 46514**

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

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

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

Operation Permit No.: M039-28511-00126	
Issued by/ <i>Original signed</i> : Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 18, 2009 Expiration Date: December 18, 2019
Significant Permit Revision No.: 039-37254-00126	
Issued by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 18, 2019

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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 bus, motor home, travel trailer, and trailer assembly source.

Source Address:	55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, Indiana 46514
General Source Phone Number:	574-534-6913
SIC Code:	3713, 3716, 3792, 3715
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

Plant 1 - 55135 CR 1, Elkhart, IN 46514

- (a) One (1) spray paint booth, identified as Trailer Paint-1, located in Building C, constructed in 2002, equipped with HVLP spray guns and dry filters for particulate control, exhausting to Stack TP-1, capacity: 1.00 metal trailer per hour or 24.0 metal trailers per day.
- (b) One (1) surface coating operation, identified as Bus Paint-1, located in Building E, constructed in 1999, consisting of one (1) blackout area and one (1) bus refinishing area, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to Stack BP-1, capacity: 0.083 metal busses per hour or 2.00 metal busses per day for blackout and 0.170 metal busses per hour or 4.00 metal busses per day for refinishing.
- (c) Thirty-nine (39) natural gas-fired space heaters, heat input capacity: 1.04 million British thermal units per hour, each.
- (d) Fifty-one (51) metal inert gas (MIG) welding stations, capacity: 0.21 pounds of rod or wire per hour per station.

Plant 9 - 914 CR 1, Elkhart, IN 46514

- (e) One (1) hot melt rolling facility, identified as Roll Coater 1, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating wood and plastic parts.

- (f) Two (2) bead applicators, identified as Bead Application 1 & 2, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, each, coating wood and plastic parts.
- (g) One (1) bus assembly operation, identified as Bus Assembly 1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating plastic parts.
- (h) One (1) recreation vehicle (RV) assembly operation, identified as B and C Assembly Area, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 0.25 RVs per hour or 6.00 RVs per day, coating plastic parts.

Plant 68 - 902 CR 1, Elkhart, IN 46514

- (i) One (1) RV assembly line, identified as Plant 68 RV Assembly 1, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of one (1) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.
- (j) One (1) woodworking operation, identified as Plant 68 WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.
- (k) Three (3) natural gas-fired space heaters, approved in 2016 for construction, with a maximum heat input capacity of 0.83 MMBtu/hour, each, and exhausting indoors.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M039-28511-00126, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M039-28511-00126 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
 Permit Administration and Support Section, Office of Air Quality
 100 North Senate Avenue
 MC 61-53 IGCN 1003
 Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1 - 55135 CR 1, Elkhart, IN 46514

- (a) One (1) spray paint booth, identified as Trailer Paint-1, located in Building C, constructed in 2002, equipped with HVLP spray guns and dry filters for particulate control, exhausting to Stack TP-1, capacity: 1.00 metal trailer per hour or 24.0 metal trailers per day.

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

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

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal, the Trailer Paint - 1 shall not allow the discharge into the atmosphere VOC in excess of the following:

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

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

D.1.3 Volatile Organic Compound (VOC) Limitations, Work Practice Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the Trailer Paint - 1 shall comply with the following:

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

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Trailer Paint -1 and the dry filters.

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC content limitation contained in Condition D.1.2 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.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 68 - 902 CR 1, Elkhart, IN 46514

- (i) One (1) RV assembly line, identified as Plant 68 RV Assembly 1, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of one (1) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.
- (j) One (1) woodworking operation, identified as Plant 68 WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal, the RV assembly line surface coating operations shall not allow the discharge into the atmosphere VOC in excess of the following:

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

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

D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from the RV assembly line surface coating operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

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

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the RV assembly line and woodworking operation.

D.2.4 Particulate Control

- (a) In order to assure the woodworking operation is not subject to the requirements of 326 IAC 6-3-2, the integral dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limit contained in Condition D.2.1 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.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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

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

Where:

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

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Forest River, Inc. - Glaval Bus Division
Address:	55135 CR 1, 914 CR 1, and 902 CR 1
City:	Elkhart, Indiana 46514
Phone #:	574-534-6913
MSOP #:	M039-28511-00126

I hereby certify that Forest River, Inc. - Glaval Bus Division still in operation.
:

no longer in operation.

I hereby certify that Forest River, Inc. - Glaval Bus Division in compliance with the requirements of MSOP M039-28511-00126.
:

not in compliance with the requirements of MSOP M039-28511-00126.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM
 ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
 CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
 CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
 INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

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

Source Description and Location
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Source Name:	Forest River, Inc. - Glaval Bus Division
Source Location:	55135 CR1, 914 CR1, and 902 CR1, Elkhart, IN 46514
County:	Elkhart
SIC Codes:	3713 (Truck and Bus Bodies) 3716 (Motor Homes) 3792 (Travel Trailers and Campers) 3715 (Truck Trailers)
Operation Permit No.:	M039-28511-00126
Operation Permit Issuance Date:	December 18, 2009
Significant Permit Revision No.:	039-37254-00126
Permit Reviewer:	Joshua Levering

On June 1, 2016, the Office of Air Quality (OAQ) received an application from Forest River, Inc. - Glaval Bus Division related to a modification to an existing stationary bus, motor home, travel trailer, and trailer assembly source.

Source Definition

This source consists of the following plants:

- (a) Forest River, Inc. - Glaval Bus Division is located at 55135 CR1 and 914 CR1, Elkhart, Indiana, Plant ID: 039-00126; and
- (b) Forest River, Inc. - Plant 68 is located at 902 CR1, Elkhart, Indiana, Plant ID: 039-00126.

The proposed Forest River, Inc. - Plant 68 will manufacture recreational vehicles. This plant will be located across a railroad track from the existing Forest River, Inc., Glaval Bus Division (source numbers 039-00126 and 039-00564).

IDEM, OAQ has examined whether these two plants should be considered one "source" as defined at 326 IAC 1-2-73. In order for two plants to be considered one major source, they must meet all three of the following criteria:

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

Forest River, Inc. owns both plants, meeting the first part of the source definition.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The Glaval Bus plant produces bus bodies and Plant 68 will produce motorized recreational vehicles. Both the Glaval Bus plant and Plant 68 have the two-digit SIC Code 37, for the Major Group Transportation Equipment.

A plant is a support facility to another plant if it dedicates 50% or more of its output to another plant. Neither plant will send output to the other plant. However, since the plants have the same two-digit SIC Code, the second part of the source definition is met.

The plants are located on properties that share a common border, separated by a railroad right-of-way. The plant properties are contiguous, meeting the third element of the source definition. The Glaval Bus Division and the Forest River, Inc. - Plant 68 meet all three parts of the source definition. Therefore, IDEM, OAQ has determined that these plants are part of the same source.

Existing Approvals

The source was issued MSOP Renewal No. 039-28511-00126 on December 18, 2009. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
 Elkhart County has been classified as attainment for PM2.5. Therefore, direct PM2.5, SO2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River, Inc. - Plant 68 on March 22, 2016, relating to the construction and operation of a stationary RV manufacturing plant. The source manufactures motorized mobile homes and applies a small amount of glues, adhesives, and caulks in the process. The industrial process consists of the RV assembly line, woodworking operations, and space heaters. This plant, identified as Plant 68, will be constructed and operated on adjacent property south of the existing Forest River, Inc. - Glaval Bus Division, and the two plants will operate as one source.

The following is a list of the new emission units and pollution control device:

Plant 68 - 902 CR 1, Elkhart, IN 46514

- (a) One (1) RV assembly line, identified as Plant 68 RV Assembly 1, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of one (1) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.
- (b) One (1) woodworking operation, identified as Plant 68 WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.
- (c) Three (3) natural gas-fired space heaters, approved in 2016 for construction, with a maximum heat input capacity of 0.83 MMBtu/hour, each, and exhausting indoors.

"Integral Part of the Process" Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes and 326 IAC 6-3 applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate emissions from the woodworking operation were calculated before consideration of the dust collector. Operating conditions in the proposed permit will specify that this dust collector shall operate at all times when the woodworking operation is in operation.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
RV Assembly	1.61	1.61	1.61	--	--	44.57	--	2.22	0.95 Toluene
Woodworking	0.07	0.07	0.07	--	--	--	--	--	--
NG Space Heaters	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.02 Hexane
Total PTE of Proposed Revision	1.70	1.76	1.76	0.01	1.07	44.63	0.90	2.24	0.95 Toluene
negl. = negligible									

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

- (i) VOC.

PTE of the Entire Source After Issuance of the MSOP Revision

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Plant 1									
Bus Paint - 1	0.75	0.75	0.75	--	--	6.59	--	3.04	1.38 Toluene
Trailer Paint - 1	3.86	3.86	3.86	--	--	7.61	--	5.53	5.53 Toluene
Space Heaters	0.34 0.33	4.35 1.32	4.35 1.32	0.14 0.10	17.77 17.42	0.98 0.96	14.92 14.63	0.34 0.31	0.31 Hexane
Welding	0.26	0.26	0.26	--	--	--	--	0.02	0.02 Mn
Plant 9									
Roll Coater 1	--	--	--	--	--	--	--	--	--
Bead Application 1 and 2	--	--	--	--	--	1.35	--	--	--
Bus Assembly 1	0.46	0.46	0.46	--	--	8.01	--	2.65	1.70 Xylene
B and C Assembly Area	0.70	0.70	0.70	--	--	23.42	--	8.18	3.42 Glycol Ether
Plant 68									

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
RV Assembly	1.61	1.61	1.61	--	--	44.57	--	2.22	0.95 Toluene
Woodworking***	0.07	0.07	0.07	--	--	--	--	--	--
NG Space Heaters	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.02 Hexane
Total PTE of Entire Source Excluding Fugitives	6.37 8.06	7.38 9.11	7.38 9.11	0.11	17.77 18.49	47.96 92.57	14.92 15.53	19.76 21.99	9.00 9.12 Xylene
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions	--	--	--	--	--	--	--	--	--
Total PTE of Entire Source Including Fugitives	8.38	9.44	9.44	0.11	18.49	92.57	15.53	21.99	9.12 Xylene
MSOP Threshold	25	25	25	25	25	25	-	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . ***Woodworking dust collectors are considered an integral control device.									

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Plant 1									
Bus Paint - 1	0.75	0.75	0.75	--	--	6.59	--	3.04	1.38 Toluene
Trailer Paint - 1	3.86	3.86	3.86	--	--	7.61	--	5.53	5.53 Toluene
Space Heaters	0.33	1.32	1.32	0.10	17.42	0.96	14.63	0.31	0.31 Hexane
Welding	0.26	0.26	0.26	--	--	--	--	0.02	0.02 Mn
Plant 9									
Roll Coater 1	--	--	--	--	--	--	--	--	--
Bead Application 1 and 2	--	--	--	--	--	1.35	--	--	--
Bus Assembly 1	0.46	0.46	0.46	--	--	8.01	--	2.65	1.70 Xylene
B and C Assembly Area	0.70	0.70	0.70	--	--	23.42	--	8.18	3.42 Glycol Ether
Plant 68									
RV Assembly	1.61	1.61	1.61	--	--	44.57	--	2.22	0.95 Toluene
Woodworking***	0.07	0.07	0.07	--	--	--	--	--	--
NG Space Heaters	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.02 Hexane

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source Excluding Fugitives	8.06	9.11	9.11	0.11	18.49	92.57	15.53	21.99	9.12 Xylene
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions	--	--	--	--	--	--	--	--	--
Total PTE of Entire Source Including Fugitives	8.06	9.11	9.11	0.11	18.49	92.57	15.53	21.99	9.12 Xylene
MSOP Threshold	25	25	25	25	25	25	-	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . ***Woodworking dust collectors are considered an integral control device.									

MSOP Status:

- (1) **Criteria Pollutants**
 This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (2) **HAPs**
 This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Permit Level Determination – PSD

- (a) **PSD Minor Source – PM**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) **PSD Minor Source – Other Regulated Pollutants**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above or Appendix A.

Federal Rule Applicability Determination

- (a) New Source Performance Standards (NSPS)
- (1) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII and 326 IAC 20-85, are not included for this proposed revision, since this source does not surface coat "automobiles" as defined in 40 CFR 63.3176.
- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM and 326 IAC 20-80, are not included for this proposed revision, since this source is not a major source of HAPs.
- (3) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included for this proposed revision, since this source does not perform any paint stripping operations, refinishing operations, or spray application of coatings containing the target HAP.
- (4) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (c) Compliance Assurance Monitoring (CAM)
- Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

RV assembly line (surface coatings)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5-8)), surface coating using dip, roll, flow, or brush coating are exempt from 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1(b)(15) surface coating operations not

exempt in 326 IAC 6-3-1(b)(5-8) that use less than five (5) gallons per day are exempt from 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1.5(5), "Surface coating" means the application of a solvent or waterbased coating in which the applicator emits or has the potential to emit particulate.

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

IDEM, OAQ has determined that application of Stay-Put Adhesive - SDS #100122 in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions. Therefore, the requirements of 326 IAC 6-3-2 do not apply.

- (b) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of the following: for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for the RV assembly line surface coating operations.

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from the RV assembly line surface coating operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- (c) 326 IAC 8-1-2 (Compliance Methods)
When using non-compliant coatings, compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

- (d) There are no other 326 IAC 8 rules that are applicable to the RV assembly line.

Woodworking Operation

- (a) 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)
 Since the following Facility has potential emissions less than 0.551 pound per hour after consideration of the integral control device, pursuant to 326 IAC 6-3-1(b)(14), they are exempt from the requirements of 326 IAC 6-3-2.

However, since these facilities have potential emissions greater than 0.551 pound per hour prior to consideration of the integral control device, in order to assure the Facility is not subject to the requirements of 326 IAC 6-3-2, the integral control device shall be in operation and control emissions from the associated Facility at all times the Facility is in operation.

Facility or Process Description	Emission Unit ID	PTE Prior to Integral Device	PTE After Integral Device
Woodworking Operation	--	0.78 lb/hr	0.02 lb/hr

Space heaters

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the space heaters, since these emissions units have individual potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination, Monitoring and Testing Requirements
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The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

The Compliance Determination Requirements applicable to this source are as follows:

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

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

Where:

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

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

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

The Compliance Monitoring Requirements applicable to this source are as follows:

Emission Unit	Control	Operating Parameters	Frequency	Response
Woodworking Operations	Baghouses	Baghouse Inspections	Quarterly	All defective bags shall be replaced

These monitoring conditions are necessary in order to assure the woodworking operations are exempt from the requirements of 326 IAC 6-3-2.

Proposed Changes

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

1. The new emission units have been added to Section A.2 as part of this revision.
2. Sections D.1.2 and D.1.3 have been updated to reflect current language for 326 IAC 8-2-9.
3. Section D.2: New section contains applicable requirements for the new emission units as part of this revision.

A.2 Emission Units and Pollution Control Equipment Summary

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

Plant 68 - 902 CR 1, Elkhart, IN 46514

- (i) **One (1) RV assembly line, identified as Plant 68 RV Assembly 1, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of one (1) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.**
- (j) **One (1) woodworking operation, identified as Plant 68 WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.**
- (k) **Three (3) natural gas-fired space heaters, approved in 2016 for construction, with a maximum heat input capacity of 0.83 MMBtu/hour, each, and exhausting indoors.**

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

~~Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at Trailer Paint -1.~~

Pursuant to 326 IAC 8-2-9, when coating metal, the Trailer Paint - 1 shall not allow the discharge into the atmosphere VOC in excess of the following:

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

- (c) **Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.**
- (d) **Three (3) pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.**

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

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), the Trailer Paint - 1 shall comply with the following:

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

- (a) **Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.**
- (b) **Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept at all times except when depositing or removing these materials.**
- (c) **Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.**
- (d) **Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.**
- (e) **Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.**

D.1.4 Preventive Maintenance Plan [326 IAC ~~2-7-5(13)~~ 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Trailer Paint -1 and the dry filters.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 68 - 902 CR 1, Elkhart, IN 46514

- (i) **One (1) RV assembly line, identified as Plant 68 RV Assembly 1, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of one (1) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.**

- (j) One (1) woodworking operation, identified as Plant 68 WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal, the RV assembly line surface coating operations shall not allow the discharge into the atmosphere VOC in excess of the following:

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

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

D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from the RV assembly line surface coating operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the RV assembly line and woodworking operation.

D.2.4 Particulate Control

(a) In order to assure the woodworking operation is not subject to the requirements of 326 IAC 6-3-2, the integral dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times the woodworking operation is in operation.

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

D.2.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limit contained in Condition D.2.1 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.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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

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

Where:

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

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

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

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

D.2.7 Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouses controlling particulate from the woodworking facilities to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection (Mandatory for operations with a baghouse)

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down

immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in condition D.2.1.
- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of each coating material and solvent used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the dates and results of the quarterly baghouse inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 1, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 039-37254-00126. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Joshua Levering at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6543 or toll free at 1-800-451-6027 extension 4-6543.
- (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
Significant Permit Revision No. 37254**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Plant 68								
RV Assembly	1.61	1.61	1.61	--	--	44.57	--	2.22
Woodworking	0.07	0.07	0.07	--	--	--	--	--
NG Space Heaters	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02
Total	1.70	1.76	1.76	0.01	1.07	44.63	0.90	2.24

**Appendix A: Emissions Calculations
Source-wide Summary**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Plant 1								
Bus Paint - 1	0.75	0.75	0.75	--	--	6.59	--	3.04
Trailer Paint - 1	3.86	3.86	3.86	--	--	7.61	--	5.53
Space Heaters	0.33	1.32	1.32	0.10	17.42	0.96	14.63	0.31
Welding	0.26	0.26	0.26	--	--	--	--	0.02
Plant 9								
Roll Coater 1	0.00	0.00	0.00	--	--	0.00	--	0.00
Bead Application 1 and 2	0.00	0.00	0.00	--	--	1.35	--	0.00
Bus Assembly 1	0.46	0.46	0.46	--	--	8.01	--	2.65
B and C Assembly Area	0.70	0.70	0.70	--	--	23.42	--	8.18
Plant 68								
RV Assembly	1.61	1.61	1.61	--	--	44.57	--	2.22
Woodworking	0.07	0.07	0.07	--	--	--	--	0.00
NG Space Heaters	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02
Total	8.06	9.11	9.11	0.11	18.49	92.57	15.53	21.99

**Appendix A: Emissions Calculations
HAPs Source-wide Summary**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Uncontrolled Potential to Emit (tons/yr)																			
Emission Unit	EB	MIBK	Toluene	Xylene	MA	1,2,4 TMB	Hexane	PCE	MeCl	DEHP	GE	Cumene	Styrene	VA	MMAL	MEK	MDI	TCE	TOTALS
Plant 1																			
Bus Paint - 1	0.25	0.35	1.02	1.38	0.01	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	--	--	0.00	3.04
Trailer Paint - 1	0.00	0.00	0.00	5.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	--	--	0.00	5.53
Space Heaters	--	--	0.00	--	--	--	0.31	--	--	--	--	--	--	--	--	--	--	--	0.31
Welding	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.02
Plant 9																			
Roll Coater 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	--	--	0.00	0.00
Bead Application 1 and 2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	--	--	0.00	0.00
Bus Assembly 1	0.00	0.00	0.87	1.70	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	--	--	0.00	2.65
B and C Assembly Area	0.00	0.00	3.02	0.39	0.00	0.00	0.77	0.01	0.00	0.04	3.42	0.01	0.12	0.16	0.24	--	--	0.00	8.18
Plant 68																			
RV Assembly	0.03	--	0.95	0.12	--	--	0.08	--	--	--	--	--	--	0.31	--	0.14	0.58	--	2.22
Woodworking	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.00
NG Space Heaters	--	--	3.64E-05	--	--	--	0.02	--	--	--	--	--	--	--	--	--	--	--	0.02
Total	0.28	0.35	5.87	9.12	0.01	0.04	1.27	0.01	0.00	0.04	3.42	0.01	0.12	0.47	0.24	0.14	0.58	0.00	21.99

HAP Abbreviations: EB = Ethylbenzene, MA = Methyl Alcohol, 1,2,4 TMB = 1, 2, 4 Trimethylbenzene, DEHP = Bis (2-ethylhexyl)phthalate, MeCl = Methylchloride, PCE = Perchloroethylene, GE = Glycol Ethers, VA = Vinyl Acetate, MMAL = Methyl-Methacrylate

**Appendix A: Emissions Calculations
VOC and Particulate
Plant 1 Surface Coating Operations**

**Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 1																	
Bus Paint-1 (Buildings E)																	
BLACKOUT AREA																	
Base Mix Enamel																	
806J	8.24	52.30%	0.00%	52.3%	0.00%	40.43%	0.0767	0.083	4.31	4.31	0.03	0.66	0.120	0.027	10.66	75%	Metal
150K	7.29	90.33%	19.20%	71.1%	19.20%	7.50%	0.2126	0.083	6.42	5.19	0.09	2.20	0.401	0.014	69.14	75%	Metal
175K	7.68	68.79%	10.40%	58.4%	10.40%	25.47%	0.0857	0.083	5.00	4.48	0.03	0.77	0.140	0.019	17.61	75%	Metal
7175S	6.65	99.80%	9.00%	90.8%	9.00%	0.13%	0.3750	0.083	6.64	6.04	0.19	4.51	0.823	0.000	4644.77	75%	Metal
Clearcoat																	
HC7600S	7.55	64.99%	9.40%	55.6%	9.40%	28.13%	0.5500	0.083	4.63	4.20	0.19	4.60	0.84	0.132	14.92	75%	Metal
REFINISHING AREA																	
Base Mix Enamel																	
801J	13.3	27.00%	0.00%	27.0%	0.00%	49.65%	0.0394	0.170	3.60	3.60	0.02	0.58	0.106	0.071	7.25	75%	Metal
807J	8.15	51.50%	0.00%	51.5%	0.00%	42.03%	0.0429	0.170	4.20	4.20	0.03	0.73	0.134	0.032	9.99	75%	Metal
882J	8.74	45.80%	0.00%	45.8%	0.00%	44.30%	0.0430	0.170	4.00	4.00	0.03	0.70	0.128	0.038	9.04	75%	Metal
150K	7.29	90.50%	19.20%	71.3%	19.20%	7.50%	0.1052	0.170	6.43	5.20	0.09	2.23	0.407	0.014	69.30	75%	Metal
175K	7.68	65.10%	10.40%	54.7%	10.40%	25.47%	0.1257	0.170	4.69	4.20	0.09	2.15	0.393	0.063	16.49	75%	Metal
7160S	6.62	99.80%	0.00%	99.8%	0.00%	0.20%	0.3563	0.170	6.61	6.61	0.40	9.60	1.75	0.001	3303.38	75%	Metal
Clearcoat																	
HC7600S	7.55	55.60%	17.20%	38.4%	17.20%	28.13%	0.3913	0.170	3.50	2.90	0.19	4.63	0.84	0.244	10.31	75%	Metal
HC7607S	8.33	52.80%	0.00%	52.8%	0.00%	39.89%	0.1088	0.170	4.40	4.40	0.08	1.95	0.356	0.080	11.03	75%	Metal
Primer																	
131S	11.2	41.30%	0.00%	41.3%	0.00%	36.14%	0.0065	0.170	4.60	4.60	0.01	0.12	0.022	0.008	12.74	75%	Metal
3642S	6.59	100.00%	30.20%	69.8%	30.20%	0.00%	0.0065	0.170	6.59	4.60	0.01	0.12	0.022	0.000	N/A	75%	Metal
Precoat																	
222S	7.08	76.30%	18.40%	57.9%	18.40%	41.10%	0.0340	0.170	5.02	4.10	0.02	0.57	0.104	0.011	9.97	75%	Metal
Gun Cleaner																	
3949S	8.25	99.86%	99.46%	0.4%	99.46%	0.14%	0.0114	0.170	6.11	0.03	0.0001	0.002	0.0003	0.00002	23.57	75%	Metal

PM Control Efficiency: 95.00%
Subtotal Uncontrolled 1.505 36.129 6.594 0.753
Subtotal Controlled 1.505 36.13 6.59 0.038

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 1																	
Trailer Paint-1 (Building C)																	
N-7618-Black Hi Solid Gloss	10.5	33.00%	0.00%	33.00%	0.00%	67.00%	0.5000	1.00	3.47	3.47	1.74	41.70	7.61	3.86	N/A	75%	Metal

PM Control Efficiency: 95.00%
Subtotal Uncontrolled 1.74 41.70 7.61 3.86
Subtotal Controlled 1.74 41.70 7.61 0.193

**Appendix A: Emissions Calculations
VOC and Particulate
Plant 9 Surface Coating Operations**

**Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 9																	
Roll Coater-1 (Hot Melt Roller)																	
Dynaflake Roll Cleaner	8.00	0.00%	0.00%	0.00%	0.00%	100%	0.0090	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Plastic
Everlock 2U265	7.66	0.00%	0.00%	0.00%	0.00%	100%	2.0000	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Plastic

PM Control Efficiency: 0.00%													
Subtotal Uncontrolled										0.00	0.00	0.000	0.000
Subtotal Controlled										0.00	0.00	0.000	0.000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 9																	
Bead Application 1 & 2																	
Hybond SIA 113	9.16	0.00%	0.00%	0.00%	0.00%	100%	2.0000	0.500	0.00	0.00	0.00	0.00	0.000	0.000	0.000	100%	Wood, Plastic
BenzoFlex 352	10.25	100.00%	0.00%	100.00%	0.00%	0.00%	0.0600	0.500	10.3	10.3	0.308	7.38	1.35	0.000	N/A	100%	Wood, Plastic
Dynosolve CU-6	8.83	0.99%	0.00%	0.99%	0.00%	99.9%	0.0200	0.500	0.09	0.09	0.00	0.02	0.004	0.000	0.088	100%	Wood, Plastic

PM Control Efficiency: 0.00%													
Subtotal Uncontrolled										0.31	7.40	1.35	0.000
Subtotal Controlled										0.31	7.40	1.35	0.000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 9																	
Bus Assembly 1																	
Spray Rite High Temp Spray Adhesive	5.0	65.0%	20.0%	45.0%	20.0%	15.00%	0.9500	0.250	2.81	2.25	0.53	12.83	2.34	0.455	15.0	75%	Plastic, Metal
Silaprene	9.75	6.30%	0.0%	6.3%	93.7%	93.70%	1.0250	0.250	9.75	0.61	0.16	3.78	0.689	0.000	N/A	100%	Plastic
Sika Tack Ultrafast Adhesive	10.83	5.0%	0.0%	5.0%	95.0%	95.00%	0.1790	0.250	10.83	0.54	0.02	0.58	0.106	0.000	N/A	100%	Plastic
Premium Adhesive 7227	6.64	40.05%	30.0%	10.1%	30.00%	20.95%	0.1140	0.250	0.95	0.67	0.02	0.46	0.083	0.000	N/A	100%	Rubber, Plastic
Surebond 190 Adhesive	7.66	38.0%	0.0%	38.0%	0.0%	62.00%	0.1250	0.250	2.91	2.91	0.09	2.18	0.398	0.000	N/A	100%	Rubber
IsoGrip Adhesive Laminator SP 3030 D	9.16	0.0%	0.0%	0.0%	0.0%	100.00%	0.0090	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	Wood
Surebond SB299 Sealant	9.75	8.0%	0.0%	8.0%	0.0%	92.00%	1.8880	0.250	0.78	0.78	0.37	8.84	1.61	0.000	N/A	100%	Plastic
Citra-Solve	6.62	100%	0.0%	100.0%	0.0%	0.00%	0.2510	0.250	6.62	6.62	0.42	9.97	1.82	0.000	N/A	100%	Plumbing
DAP Black Touch N Tone Spray Paint	5.58	65.0%	30.0%	35.0%	30.0%	5.00%	0.0080	0.250	2.79	1.95	0.00	0.09	0.017	0.004	39.1	75%	Plastic
Buckey XL100	8.41	95.0%	83.0%	12.0%	83.0%	5.00%	0.0680	0.250	5.94	1.01	0.02	0.41	0.075	0.000	N/A	100%	Plastic
Sikaflex 221	9.91	4.40%	0.0%	4.4%	0.0%	95.60%	0.0380	0.250	0.44	0.44	0.00	0.10	0.018	0.000	N/A	100%	Plastic, Metal
3M UltraPro Autobody Sealant	9.91	5.00%	0.0%	5.0%	0.0%	95.00%	0.0030	0.250	0.50	0.50	0.00	0.01	0.002	0.000	N/A	100%	Rubber
Final Kleen - 3901-S	6.05	100%	0.0%	100.0%	0.0%	0.00%	0.1280	0.250	6.05	6.05	0.19	4.65	0.848	0.000	N/A	100%	ABS Plastic
Premium Adhesive 7355	7.09	75.0%	75.0%	0.0%	75.0%	25.00%	0.1250	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	ABS Plastic
Red/Blue Hardener	10.0	20.0%	20.0%	0.0%	20.0%	80.00%	0.0010	0.250	0.00	0.00	0.00	0.00	0.000	0.000	N/A	100%	Rubber

PM Control Efficiency: 0.00%													
Subtotal Uncontrolled										1.83	43.89	8.01	0.459
Subtotal Controlled										1.83	43.89	8.01	0.459

**Appendix A: Emissions Calculations
VOC and Particulate
Plant 9 Surface Coating Operations**

**Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Type of Material coated
Plant 9																	
B and C Assembly Area																	
Lap Sealant	9.9	32.50%	0.00%	32.5%	0.00%	67.50%	0.4980	0.250	3.22	3.22	0.40	9.62	1.76	0.000	4.77	100%	Rubber
Oatey ABS Cement	7.25	78.00%	0.00%	78.0%	0.00%	22.00%	0.0250	0.250	5.66	5.66	0.04	0.85	0.155	0.000	25.70	100%	ABS Plastic
Oatey Cleaner	6.61	100.00%	10.00%	90.0%	10.00%	0.00%	0.0040	0.250	6.61	5.95	0.01	0.14	0.026	0.000	N/A	100%	ABS Plastic
Construction Silicone	8.66	5.00%	0.00%	5.0%	0.00%	95.00%	0.2000	0.250	0.43	0.43	0.02	0.52	0.095	0.000	0.46	100%	Rubber, Plastic
Bonding Cement	8.20	50.00%	49.90%	0.1%	49.90%	50.00%	1.0800	0.250	0.02	0.01	0.00	0.05	0.010	0.000	0.02	100%	Rubber
Super Bond 4H	7.50	72.30%	0.00%	72.3%	0.00%	27.70%	0.2200	0.250	5.42	5.42	0.30	7.16	1.31	0.000	19.58	100%	Fabric
WEB 76 Adhesived	5.83	77.20%	25.00%	52.2%	25.00%	16.00%	0.3100	0.250	4.06	3.04	0.24	5.66	1.03	0.000	19.02	100%	Fabric
Panel Hold Black RV Foam	8.41	14.20%	0.00%	14.2%	0.00%	85.80%	0.9200	0.250	1.19	1.19	0.27	6.59	1.20	0.000	N/A	100%	Panel Glue
Panel Hold Cleaner	6.58	100.00%	85.00%	15.0%	85.00%	0.00%	0.0090	0.250	6.58	0.99	0.00	0.05	0.010	0.000	N/A	100%	Panel Glue
Denatured Alcohol	6.76	100.00%	7.00%	93.0%	7.00%	0.00%	0.0090	0.250	6.76	6.29	0.01	0.34	0.062	0.000	N/A	100%	Plastic, Metal
Ethanol	6.70	100.00%	5.00%	95.0%	5.00%	0.00%	0.2100	0.250	6.70	6.37	0.33	8.02	1.46	0.000	N/A	100%	Plastic, Metal
Battery Protector C121	6.00	73.00%	7.00%	66.0%	7.00%	20.00%	0.0120	0.250	4.26	3.96	0.01	0.29	0.052	0.000	19.80	100%	Battery
Citra Foam	7.96	100.00%	0.00%	100.0%	0.00%	0.00%	0.0670	0.250	7.96	7.96	0.13	3.20	0.584	0.000	N/A	100%	Plastic
Color Flex	13.16	17.00%	0.00%	17.0%	0.00%	83.00%	0.1800	0.250	2.24	2.24	0.10	2.42	0.441	0.000	2.70	100%	Wood
Spray N Go Paint	6.66	75.20%	0.00%	75.2%	0.00%	24.80%	0.9840	0.250	5.01	5.01	1.23	29.57	5.40	0.445	20.19	75%	Metal (Auto Ref)
Glass Cleaner	8.25	93.50%	93.50%	0.0%	93.50%	7.50%	0.2400	0.250	0.00	0.00	0.00	0.00	0.000	0.035	0.00	75%	Glass
Instand Bond White Glue	9.16	72.00%	71.50%	0.5%	71.50%	28.00%	1.2000	0.250	0.16	0.05	0.01	0.33	0.060	0.000	0.16	100%	Wood
Mastic	12.50	0.00%	0.00%	0.0%	0.00%	100.00%	0.4300	0.250	0.00	0.00	0.00	0.00	0.000	0.000	0.00	100%	Plastic
Brake & Parts Cleaner	12.00	100.00%	72.00%	28.0%	72.00%	0.00%	0.0010	0.250	12.00	3.36	0.00	0.02	0.004	0.000	N/A	100%	Engine Parts
Mineral Spirits	6.31	100.00%	0.00%	100.0%	0.00%	0.00%	0.0050	0.250	6.31	6.31	0.01	0.19	0.035	0.000	N/A	100%	Metal
Geocell 2320	7.91	35.10%	0.00%	35.1%	0.00%	64.90%	0.0457	0.250	2.78	2.78	0.03	0.76	0.139	0.000	4.28	100%	Plastic
DAP 4000 Construction Adhesive	8.85	38.70%	0.00%	38.7%	0.00%	61.30%	0.2600	0.250	3.42	3.42	0.22	5.34	0.975	0.000	5.59	100%	Lam. Floor
Elastomeric Clear Sealant	7.83	32.50%	0.00%	32.5%	0.00%	65.00%	0.1500	0.250	2.54	2.54	0.10	2.29	0.418	0.000	3.92	100%	Plastic
Sta-Put 2001M	5.91	75.00%	0.00%	75.0%	0.00%	25.00%	0.5430	0.250	4.43	4.43	0.60	14.44	2.64	0.220	17.73	75%	Fabric
3M SuperDuty Rubbing Compound	8.33	44.20%	17.90%	26.3%	17.90%	55.80%	0.0080	0.250	2.67	2.19	0.00	0.11	0.019	0.000	3.93	100%	Metal
Finishing Putty (Icing)	9.58	24.50%	0.00%	24.5%	0.00%	75.50%	0.0080	0.250	2.35	2.35	0.00	0.11	0.021	0.000	3.11	100%	Plastic
Enerbond 45 SF	10.00	100.00%	0.00%	100.0%	0.00%	0.00%	0.3420	0.250	N/A	10.00	0.86	20.52	3.74	0.000	N/A	100%	Plastic, Laminate
Enerbond 10 Cleaner	7.98	95.80%	0.00%	95.8%	0.00%	4.20%	0.0010	0.250	7.64	7.64	0.00	0.05	0.008	0.000	N/A	75%	Plastic, Laminate
Gelcoat Filon Panel White	10.83	36.70%	0.00%	36.7%	0.00%	63.30%	0.0200	0.250	3.97	3.97	0.02	0.48	0.087	0.000	6.28	100%	Plastic
3M Perfect It Foam Polishing Pad Glaze	8.78	86.00%	60.00%	26.0%	60.00%	14.00%	0.0020	0.250	5.71	2.28	0.00	0.03	0.005	0.000	16.31	100%	Fabric
ITW Foamseal S11608	9.83	39.00%	0.00%	39.0%	0.00%	61.00%	0.3940	0.250	3.83	3.83	0.38	9.06	1.65	0.000	6.28	100%	Plastic, Metal
ITW Foamseal FSA	10.33	0.00%	0.00%	0.0%	0.00%	100.00%	0.3940	0.250	N/A	0.00	0.00	0.00	0.000	0.000	N/A	100%	Plastic, Metal
Feather Rite Body Filler	9.66	18.60%	0.00%	18.6%	0.00%	81.40%	0.0010	0.250	1.80	1.80	0.00	0.01	0.002	0.000	2.21	100%	Plastic
Lacquer Thinner	7.00	100.00%	0.00%	100.0%	0.00%	28.13%	0.0030	0.250	7.00	7.00	0.01	0.13	0.023	0.000	24.88	100%	Metal, Plastic

Note that all coatings are "as applied" to the applicators

PM Control Efficiency:		0.00%			
Subtotal Uncontrolled		5.35	128	23.4	0.700
Subtotal Controlled		5.35	128	23.4	0.700

State Potential Emissions

Add worst case coating to all solvents

Total Uncontrolled		10.73	257.46	46.99	5.77
Total Controlled		10.73	257	47.0	1.39

Methodology for Plants 1 and 9 calculations

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 = VOC Coating + Sum of all solvents used

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

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Plant 1 has thirty-nine (39) natural gas-fired space heaters, each with a maximum heat input capacity of 1.04 MMBtu/hour.

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
40.56	1020	348.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.33	1.32	1.32	0.10	**see below	0.96	14.63

*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	3.7E-04	2.1E-04	1.3E-02	0.31	5.9E-04	0.33

	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	8.7E-05	1.9E-04	2.4E-04	6.6E-05	3.7E-04	9.5E-04
					Total HAPs	0.33
					Worst HAP	0.31

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**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Plant 68 has three (3) natural gas-fired space heaters with a maximum heat input capacity of 0.83 MMBtu/hour, each.

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Pollutant						
2.49	1020	21.4	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
			1.9	7.6	7.6	0.6	100	5.5	84
			0.02	0.08	0.08	0.01	**see below	1.07	0.06

*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	8.0E-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	4.1E-06	2.2E-05	5.9E-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
Welding and Thermal Cutting**

**Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	51	0.21	0.0055	0.0005			0.059	0.005	0.000	0.000	0.005
							EMISSIONS (tons/yr)				HAPS (tons/yr)
							0.26	0.02	0.00	0.00	0.023

METHODOLOGY

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

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

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

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

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

**Appendix A: Emissions Calculations
HAPs from Assembly Operation**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Plant 68 Assembly Line				Weight %							Potential Emissions (tons/year)						
Material	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ethyl Benzene (100-41-4)	Vinyl Acetate (108-05-4)	N-Hexane (110-54-3)	Methyl Ethyl Ketone (78-93-3)	Toluene (108-88-3)	MDI (101-68-8)	Xylene (1330-20-7)	Ethyl Benzene (100-41-4)	Vinyl Acetate (108-05-4)	N-Hexane (110-54-3)	Methyl Ethyl Ketone (78-93-3)	Toluene (108-88-3)	MDI (101-68-8)	Xylene (1330-20-7)
ABS Cement - SDS ID # 100062	7.33	0.007	1.00	-	-	-	0.45	-	-	-	-	-	-	0.1	-	-	-
ABS Cleaner - SDS ID # 100069	6.93	0.007	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Handi Foam Sealant - SDS ID # 100076	9.17	0.192	1.00	-	-	-	-	-	0.075	-	-	-	-	-	-	0.577	-
Alkyd Black Paint - SDS ID # 100188	9.73	0.015	1.00	-	-	-	0.06	-	-	-	-	-	-	0.04	-	-	-
Alpha 1010 Caulk - SDS ID # 100214	11.92	2.128	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Alpha 8011 Adhesive - SDS ID # 100216	8.35	2.128	1.00	-	0.004	-	-	-	-	-	-	0.31	0.00	-	-	-	-
Sealer 1985S - SDS ID # 100413	11.02	0.028	1.00	0.022	-	-	-	0.16	-	0.09	0.03	-	-	-	0.22	-	0.12
Spray Silicone - SDS ID # 100260	5.34	0.001	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mineral Spirits - SDS ID # 100150	6.59	0.390	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tar Go - Beaver Research Company - SDS ID # 101924	7.08	0.390	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HMO1208 Pre-Cleaner - SDS ID # 101033	6.46	0.177	1.00	-	-	-	-	0.146	-	-	-	-	-	-	0.732	-	-
630 Contact Adhesive - SDS ID # 101062	5.34	0.001	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gasolia Soft Set - SDS ID # 100405	11.99	0.013	1.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Spray'n'Go Paint - SDS ID # 100042	6.22	0.001	1.00	0.018	-	-	-	0.175	-	0.068	0.000	-	-	-	0.003	-	0.001
Sta-Put Adhesive - SDS ID# 100122	5.86	0.033	1.00	-	-	0.10	-	-	-	-	-	-	0.08	-	-	-	-
TOTAL:											0.03	0.31	0.08	0.14	0.95	0.58	0.12

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
 Ashland Distr. Co. ODORLESS MINERAL SPIRITS - MSDS ID 100137 does not contain HAPs.

Highest Single HAP (ton/yr): 0.95
HAPs Total (tons/yr): 2.22

**Appendix A: Emission Calculations
Woodworking Operations**

Company Name: Forest River, Inc. - Glaval Bus Division
Address City IN Zip: 55135 CR 1, 914 CR 1, and 902 CR 1, Elkhart, IN 46514
MSOP No.: M039-28511-00126
Significant Permit Revision No.: 039-37254-00126
Reviewer: Joshua Levering
Date: July 2016

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls* (lb/hr)	PM Emission Rate after Controls* (tons/yr)
Plant 68 WW-1							
Woodworking	98.00%	0.00073	2500	0.78	3.42	0.02	0.07
Totals:				0.78	3.42	0.02	0.07

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Uncontrolled emissions

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

* In October 1993, a Final Order Granting Summary Judgment was signed by an Administrative Law Judge (ALJ) resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and is integral to the normal operation of the facility, and therefore, potential emissions were to be calculated after consideration of the controls.



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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August 24, 2016

Mr. William G. Conway, Jr.
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PO Box 3030
Elkhart, IN 46515

Re: Public Notice
Forest River, Inc. – Glaval Bus Division
Permit Level: Minor Source Operating Permit
(MSOP) Significant Permit Revision
Permit Number: 039-37254-00126

Dear Mr. Conway:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Elkhart Truth in Elkhart, Indiana publish the abbreviated version of the public notice no later than August 26, 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 Elkhart Public Library, 300 South Second Street in Elkhart, 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 Joshua Levering, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6543 or dial (317) 234-6543.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 22, 2016

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

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Forest River, Inc. – Glaval Bus Division, Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 26, 2016.

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

To ensure proper payment, please reference account # 100174737.

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

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Minor Source Operating Permit (MSOP) Significant Permit Revision
Permit Number: 039-37254-00126

Enclosure
PN Newspaper.dot 8/27/2015



Indiana Department of Environmental Management

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100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 24, 2016

To: Elkhart Public Library

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

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

Applicant Name: Forest River, Inc. – Glaval Bus Division
Permit Number: 039-37254-00126

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



Indiana Department of Environmental Management

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100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 24, 2016
Forest River, Inc. – Glaval Bus Division
039-37254-00126

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 8/24/2016 Forest River, Inc. - Glaval Bus Division 039-37254-00126 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		William G Conway Jr Forest River, Inc. - Glaval Bus Division PO Box 3030 Elkhart IN 46515-3030 (Source CAATS)										
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Joe Kinder DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)										
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