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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for Forest River, Inc. - US Cargo Division in Elkhart County

MSOP Renewal No.: M039-40487-00431

The Indiana Department of Environmental Management (IDEM) has received an application from Forest River, Inc. - US Cargo Division located at 17645 & 17830 Commerce Drive, Bristol, Indiana 46507 for a renewal of its MSOP issued on January 15, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Forest River, Inc. - US Cargo Division to continue to operate its existing source.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Bristol Washington Township Public Library
505 West Vistula St.
Bristol, IN 46507

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, 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/.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M039-40487-00431 in all correspondence.

Comments should be sent to:

Thomas Uher
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Thomas Uher or (317) 233-1782
Or dial directly: (317) 233-1782
Fax: (317) 232-6749 attn: Thomas Uher
E-mail: Tuher@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Thomas Uher of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

DRAFT

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Forest River, Inc. - US Cargo Division
17645 & 17830 Commerce Drive
Bristol, Indiana 46507

(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.: 039-40487-00431 Master Agency Interest ID: 32826	
Issued by: Brian Willams, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary cargo trailer manufacturing source.

Source Address:	17645 & 17830 Commerce Drive, Bristol, Indiana 46507
General Source Phone Number:	574-848-1141
SIC Code:	3799 (Transportation Equipment, Not Elsewhere Classified)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

Plant 1 (17645 Commerce Drive):

(a) One (1) trailer assembly area, identified as EU-01, constructed in 1997, applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum production rate of 2 units per hour, uncontrolled, and exhausting indoors.

(b) One (1) paint shop consisting of two (2) spray booths, identified as EU-03 and EU-04, constructed in 1997, using high volume low pressure (HVLP) guns to coat metal and plywood, each with a maximum production rate of two (2) units per hour, uncontrolled, and exhausting to stacks SV-4 and SV-5 respectively.

(c) One (1) welding operation, identified as EU-05, constructed in 1997, consisting of twenty-five (25) welding stations consuming a total of eight hundred thirty-three ten-thousandths (0.833) pounds of electrode per hour.

(d) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Panel Saw, identified as WW-01, with a maximum process weight rate of 600 lbs/hr, controlled by a baghouse, and exhausting indoors

(2) One (1) Table Saw, identified as WW-02, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(3) One (1) Table Saw, identified as WW-03, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(4) One (1) Table Saw, identified as WW-04, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(5) One (1) Table Saw, identified as WW-05, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

Plant 2 (17830 Commerce Drive):

(a) One (1) trailer assembly area, identified as EU-02, constructed in 1997, applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum production rate of 2 units per hour, uncontrolled, and exhausting indoors.

(b) One (1) welding operation, identified as EU-06, constructed in 1997, consisting of seventeen (17) welding stations consuming a total of one and twenty hundredths (1.20) pounds of electrode per hour.

(c) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Table Saw, identified as WW-06, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(2) One (1) Table Saw, identified as WW-07, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(d) Natural gas fired combustion units located throughout each plant, constructed in 1997, and consisting of:

(1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of sixteen hundredths (0.16) MMBtu per hour.

(2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of two and sixty hundredths (2.60) MMBtu per hour.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, 039-40487-00431, 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 039-40487-00431 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 Stack Height [326 IAC 1-7]

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

C.8 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.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1 (17645 Commerce Drive):

(b) One (1) paint shop consisting of two (2) spray booths, identified as EU-03 and EU-04, constructed in 1997, using high volume low pressure (HVLP) guns to coat metal and plywood, each with a maximum production rate of two (2) units per hour, uncontrolled, and exhausting to stacks SV-4 and SV-5 respectively.

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

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), 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 applicator, for the following units:

Unit ID
Paint Booth EU-03
Paint Booth EU-04

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

Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), 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 closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2(d)]

(a) Particulate from Paint Booths EU-03 and EU-04 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.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.5 Volatile Organic Compounds [326 IAC8-1-2] [326 IAC 8-1-4]

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

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

D.1.6 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

(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 in Paint Booths EU-03 and EU-04.

(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 solvent.

(b) To document the compliance status with Condition D.1.3(c), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1 (17645 Commerce Drive):

(c) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Panel Saw, identified as WW-01, with a maximum process weight rate of 600 lbs/hr, controlled by a baghouse, and exhausting indoors

(2) One (1) Table Saw, identified as WW-02, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(3) One (1) Table Saw, identified as WW-03, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(4) One (1) Table Saw, identified as WW-04, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(5) One (1) Table Saw, identified as WW-05, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

Plant 2 (17830 Commerce Drive):

(d) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Table Saw, identified as WW-06, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(2) One (1) Table Saw, identified as WW-07, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

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

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

D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.2 Particulate Control [326 IAC 6-3-2]

(a) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to each woodworking operation, identified as WW-01 through WW-07, the baghouse and dust collectors for particulate control shall be in operation and control emissions from the associated woodworking processes at all times each woodworking operation (WW-01 through WW-07) is in operation.

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

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

D.2.3 Baghouse/ Dust Collector Inspections

The Permittee shall perform semiannual inspections of the baghouse/ dust collectors controlling particulate from woodworking operations (WW-01 through WW-07) to verify that they are being operated and maintained in accordance with the manufacturer's specifications when venting indoors. A baghouse/ dust collector inspection shall be performed within six months of redirecting vents indoors and every six months thereafter, unless exhausting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.4 Broken or Failed Bag Detection

(a) For a single compartment baghouses/ dust collectors 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 C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse/ dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the woodworking operation (WW-01 through WW-07). 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 C - Response to Excursions or Exceedances).

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

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.3.

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

SECTION E.1 NESHAP

Emissions Unit Description:

Plant 2 (17830 Commerce Drive):

(b) One (1) paint shop consisting of two (2) spray booths, identified as EU-03 and EU-04, constructed in 1997, using high volume low pressure (HVLP) guns to coat metal and plywood, each with a maximum production rate of two (2) units per hour, uncontrolled, and exhausting to stacks SV-4 and SV-5 respectively.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-6.1-5(a)(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, NESHAP [40 CFR Part 63, Subpart HHHHHH]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A to the operating permit for the emission unit(s) listed above:

(1) 40 CFR 63.11169
(2) 40 CFR 63.11170(a)(2), (b)
(3) 40 CFR 63.11171(a), (b), (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2), (g)(3)
(6) 40 CFR 63.11174
(7) 40 CFR 63.11175
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a) through (d), (g)

(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

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. - US Cargo Division
Address:	17645 & 17830 Commerce Drive
City:	Bristol, Indiana 46507
Phone #:	574-534-6913
MSOP #:	039-40487-00431

I hereby certify that Forest River, Inc. - US Cargo Division :
☐ still in operation.
☐ no longer in operation.

I hereby certify that Forest River, Inc. - US Cargo Division :
☐ in compliance with the requirements of MSOP 039-40487-00431.
☐ not in compliance with the requirements of MSOP 039-40487-00431.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Attachment A

Minor Source Operating Permit (MSOP) No: M039-40487-00431

[Downloaded from the eCFR on July 1, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Source: 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in § 63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in § 63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in § 63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

§ 63.11170 Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in § 63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in § 63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in § 63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in § 63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in § 63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

§ 63.11171 How do I know if my source is considered a new source or an existing source?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in § 63.11170, with the exception of those activities listed in § 63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in § 63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

General Compliance Requirements

§ 63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

§ 63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as

applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see § 63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer

Efficient Spray Guns, September 26, 2002" (incorporated by reference, see § 63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in § 63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to § 63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in § 63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in § 63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the

date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

§ 63.11174 What parts of the General Provisions apply to me?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by § 63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in § 63.11173(a) through (d)

of this subpart. For surface coating operations, the relevant requirements are specified in § 63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in § 63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in § 63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with § 63.11173(b).

§ 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by § 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in § 63.11173(a) through (d) or § 63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with § 63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with § 63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with § 63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in § 63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§ 63.11173(d) and 63.11177(f).

§ 63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in § 63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in § 63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in § 63.11173(e)(4).

(d) Copies of any notification submitted as required by § 63.11175 and copies of any report submitted as required by § 63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in § 63.11173, § 63.11174, § 63.11175, or § 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

§ 63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in § 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in § 63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Administrator means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

Aerospace vehicle or component means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

Airless and air-assisted airless spray mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.

(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

Compliance date means the date by which you must comply with this subpart.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

Dry media blasting means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

Electrostatic application means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Equipment cleaning means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

Facility maintenance means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

High-volume, low-pressure (HVLP) spray equipment means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Initial startup means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

Materials that contain HAP or *HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers,

demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous parts and/or products means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

Paint stripping and/or miscellaneous surface coating source or facility means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Painter means any person who spray applies coating.

Plastic refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

Protective oil means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and laboratory activities means surface coating or paint stripping activities that meet one of the following criteria:

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

Solvent means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

Space Vehicle means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

Spray-applied coating operations means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Surface preparation or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Target HAP containing coating means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety

data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

Transfer efficiency means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

Truck bed liner coating means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.1(a)(1)-(12)	General Applicability	Yes	
§ 63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in § 63.11170.
§ 63.1(c)(1)	Applicability After Standard Established	Yes	
§ 63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.1(c)(5)	Notifications	Yes	
§ 63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.2	Definitions	Yes	Additional definitions are specified in § 63.11180.
§ 63.3(a)-(c)	Units and Abbreviations	Yes	
§ 63.4(a)(1)-(5)	Prohibited Activities	Yes	
§ 63.4(b)-(c)	Circumvention/Fragmentation	Yes	
§ 63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§ 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§ 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(e)(1)-(2)	Operation and Maintenance	Yes	
§ 63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§ 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§ 63.6(f)(2)-(3)	Methods for Determining Compliance	Yes	
§ 63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§ 63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§ 63.6(i)(1)-(16)	Extension of Compliance	Yes	
§ 63.6(j)	Presidential Compliance Exemption	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§ 63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§ 63.9(a)-(d)	Notification Requirements	Yes	§ 63.11175 specifies notification requirements.
§ 63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§ 63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§ 63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§ 63.9(h)	Notification of Compliance Status	No	§ 63.11175 specifies the dates and required content for submitting the notification of compliance status.
§ 63.9(i)	Adjustment of Submittal Deadlines	Yes	
§ 63.9(j)	Change in Previous Information	Yes	§ 63.11176(a) specifies the dates for submitting the notification of changes report.
§ 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§ 63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in § 63.11177.
§ 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§ 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§ 63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§ 63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§ 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§ 63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in § 63.11176.
§ 63.10(d)(2)-(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§ 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§ 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§ 63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§ 63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§ 63.12	State Authority and Delegations	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§ 63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in § 63.11173(e)(2) and (3) are incorporated and included in § 63.14.
§ 63.15	Availability of Information/Confidentiality	Yes	
§ 63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§ 63.16(b)-(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Forest River, Inc. - US Cargo Division**
Source Location:	**17645 & 17830 Commerce Drive, Bristol, Indiana 46507**
County:	**Elkhart**
SIC Code:	**3799 (Transportation Equipment, Not Elsewhere Classified)**
Permit Renewal No.:	**M039-40487-00431**
Permit Reviewer:	**Thomas Uher**

On September 18, 2018, Forest River, Inc. - US Cargo Division submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Forest River, Inc. - US Cargo Division relating to the operation of a stationary cargo trailer manufacturing source. Forest River, Inc. - US Cargo Division was issued its first MSOP Renewal (M039-26925-00431) on January 15, 2009.

Source Definition

On February 17, 2004, IDEM, OAQ, conducted a source determination and concluded that this source consists of two (2) plants:

(a) Plant 1 is located at 17645 Commerce Drive, Bristol, Indiana 46507.
(b) Plant 2 is located at 17830 Commerce Drive, Bristol, Indiana 46507.

Because these plants are still owned by the same company, still operate under the same SIC code (3799), and are still located on contiguous properties, they will continue to be considered as one source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Plant 1 (17645 Commerce Drive):

(a) One (1) trailer assembly area, identified as EU-01, constructed in 1997, applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum production rate of 2 units per hour, uncontrolled, and exhausting indoors.

(b) One (1) paint shop consisting of two (2) spray booths, identified as EU-03 and EU-04, constructed in 1997, using high volume low pressure (HVLP) guns to coat metal and plywood, each with a maximum production rate of two (2) units per hour, uncontrolled, and exhausting to stacks SV-4 and SV-5 respectively.

(c) One (1) welding operation, identified as EU-05, constructed in 1997, consisting of twenty-five (25) welding stations consuming a total of eight hundred thirty-three ten-thousandths (0.833) pounds of electrode per hour.

(d) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Panel Saw, identified as WW-01, with a maximum process weight rate of 600 lbs/hr, controlled by a baghouse, and exhausting indoors

(2) One (1) Table Saw, identified as WW-02, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(3) One (1) Table Saw, identified as WW-03, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(4) One (1) Table Saw, identified as WW-04, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(5) One (1) Table Saw, identified as WW-05, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

Plant 2 (17830 Commerce Drive):

(a) One (1) trailer assembly area, identified as EU-02, constructed in 1997, applying sealant and adhesives to plywood, and brush or aerosol applied touch-up coatings to metal, with a maximum production rate of 2 units per hour, uncontrolled, and exhausting indoors.

(b) One (1) welding operation, identified as EU-06, constructed in 1997, consisting of seventeen (17) welding stations consuming a total of one and twenty hundredths (1.20) pounds of electrode per hour.

(c) Woodworking operations, constructed in 1997, consisting of the following:

(1) One (1) Table Saw, identified as WW-06, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(2) One (1) Table Saw, identified as WW-07, with a maximum process weight rate of 200 lbs/hr, controlled by a Jet DC-605M Dust Collector, and exhausting indoors.

(d) Natural gas fired combustion units located throughout each plant, constructed in 1997, and consisting of:

(1) Forty-two (42) natural gas-fired radiant heaters each with a maximum heat input capacity of sixteen hundredths (0.16) MMBtu per hour.

(2) One (1) natural gas-fired air make-up unit with a maximum heat input capacity of two and sixty hundredths (2.60) MMBtu per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) powder coating room with a maximum throughput rate of five (5) pounds of powder coat per hour, controlled by dry filters. This unit was constructed in 2000.

(b) Natural gas fired combustion units, constructed in 1997, and consisting of:

(1) Two (2) natural gas-fired burners, each with a maximum heat input capacity of four and twenty-five hundredths (4.25) MMBtu per hour.

(2) Three (3) natural gas-fired drying ovens, uncontrolled and exhausting to the indoors, and consisting of:

(A) Drying oven 1 has a maximum heat input capacity of five (5.00) MMBtu per hour;

(B) Drying oven 2 has a maximum heat input capacity of one and six tenths (1.6) MMBtu per hour; and

(C) Drying oven 3 has a maximum heat input capacity of three and five tenths (3.5) MMBtu per hour.

Existing Approvals

The source was issued MSOP Renewal No. M039-26925-00431 on January 15, 2009. There have been no subsequent approvals issued.

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

"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, the potential to emit particulate matter from the woodworking operations were calculated after consideration of the controls for determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and Prevention of Significant Deterioration (PSD)

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County. The following attainment status designations are applicable to 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.

Pollutant	Designation
Pb	Unclassifiable or attainment effective December 31, 2011.

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

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

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, 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 the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Greenhouse Gas (GHG) Emissions

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	**Tons/year**
PM	74.63
PM_{10}	72.17
$PM_{2.5}$	70.66
SO_2	0.02
NO_x	4.00
VOC	49.07
CO	3.36
Single HAP	0.72
Total HAP	1.25

Unrestricted Potential Emissions	
HAPs	**Tons/Year**
Toluene	0.72
Hexane	0.34
Xylene	0.10
Manganese	0.09
Other	<.01
Total	**1.25**

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, PM, PM10, PM2.5, and VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

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

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Process/ Emission Unit	**PM[1]**	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_x**	**VOC**	**CO**	**Worst Single HAP**	**Total HAPs**
Trailer Assembly - EU-01 & EU-02	0.62	0.62	0.62	0.00	0.00	7.93	0.00	0.36	0.54
Paint Booths - EU-03 & EU-04	68.08	68.08	68.08	0.00	0.00	40.92	0.00	0.00	0.00
Woodworking[4]	1.50	1.50	1.50	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.99	0.99	0.00	0.00	0.00	0.00	0.00	0.00	4.55E-02
NG Combustion	0.08	0.30	0.30	0.02	4.00	0.22	3.36	1.36E-04	7.55E-02

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_x**	**VOC**	**CO**	**Worst Single HAP**	**Total HAPs**
Fugitive Emissions (paved roads)	*3.37*	*0.67*	*0.17*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*
Total PTE of Entire Source	**74.63**	**72.17**	**70.66**	**0.02**	**4.00**	**49.07**	**3.36**	**0.36**	**0.66**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[3]Single highest source-wide HAP = Toluene.
[4]Emissions after integral control devices

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Compliance Assurance Monitoring (CAM):

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

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are still not included in the permit, since this source does not coat metal furniture.

(b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are still not included in the permit, since the natural gas fired units at this source do not generate steam.

(c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations 40 CFR 60.390, Subpart MM, are still not included in the permit for the recreational vehicle surface coating operations because this facility manufactures cargo trailers, which do not meet the definition of an automobile or light duty truck.

(d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM are still not included in the permit for the source, because this rule only applies to major sources of HAPs. This source is an area source of HAPs. Therefore, the source is not subject to this rule.

(b) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63, Subpart IIII), Surface Coating of Automobiles and Light Duty Trucks, because the source does not meet the definition of an automobile or light duty truck surface coating operation. This source operates a cargo trailer manufacturing plant with gross vehicle weight rating of greater than 8,500 pounds. Therefore, Subpart IIII does not apply and the requirements of the NESHAP are not included in the permit.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are still not included in the permit, since the source does not coat metal furniture at this facility.

(d) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63, Subpart DDDDD), Industrial, Commercial, and Institutional Boilers and Process Heaters, because the heaters located at this source do not meet the definition of boiler or process heater, pursuant to 40 CFR Part 63.7575 and the source is not a major source of HAPs. Therefore, the requirements of the NESHAP are not included in the permit.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ, are still not included in the permit, since the heating units located at this source do not meet the definition of a boiler as it is defined in 40 CFR 63.11237. Therefore, this rule does not apply to the source.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH, are included in the permit for the this source. Pursuant to 40 CFR 63.11169, the purpose of this NESHAP is to control emissions from the following activities located at an area source of HAPs:

(1) Performs Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes.

(2) Performs spray coatings (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for autobody refinishing and mobile equipment.

(3) Performs spray coatings (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for any part or product made of metal or plastic, or combinations of metal and plastic.

Pursuant to 40 CFR 63.11170(a)(2), area sources of HAPs which perform the spray application of coating, as defined in 40 CFR 63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, are subject to this rule. The paint booths (EU-03) are located at an area source of HAPs, and perform spray application of coating to mobile equipment, as it is defined in 40 CFR 63.11180, at a stationary structure. Therefore, this unit is subject to this rule.

Based on the SDS sheets provided by the source, there are no target HAPs in any of the spray applied coatings at the source. If the source would like to be exempt from this rule, the source may petition the Administrator for an exemption from this subpart by demonstrating to the satisfaction of the Administrator that they spray apply no coatings that contain target HAPs, as defined in 40 CFR 63.11180.

The source does not perform any paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes. The source performs metal coating (miscellaneous coating) operations, however the source does not use any coatings that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Therefore, this NESHAP does not apply the source.

The two paint booths (EU-03) are subject to the following portions of Subpart HHHHHH.

(1) 40 CFR 63.11169
(2) 40 CFR 63.11170(a)(2), (b)
(3) 40 CFR 63.11171(a), (b), (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2), (g)(3)
(6) 40 CFR 63.11174
(7) 40 CFR 63.11175
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a) through (d), (g)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHHH.

(g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

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

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than twenty five (25) tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

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

State Rule Applicability – Individual Facilities

Surface Coating and Assembly

326 IAC 6-3-2 (Particulate Matter Emissions from Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from Paint Booths EU-03 and EU-04 shall be controlled by dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. These booths are subject to this rule because they each use five (5) gallons or more of material per day when applying materials that are not otherwise exempted from this rule.

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.

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.

Pursuant to 326 IAC 6-3-1(15), Assemblies EU-01 and EU-02 are not subject to this rule. These units use less than five (5) gallons of coating per day when applying materials not otherwise exempted from this rule.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Assemblies EU-01 and EU-02 are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each of these units is less than twenty-five (25) tons per year when coating a substrate not otherwise regulated under 326 IAC 8, and each unit is subject to 326 IAC 8-2-9 when coating metal parts (Miscellaneous Metal and Plastic Coating Operations).

Paint Booths EU-03 and EU-04 are not subject to the requirements of 326 IAC 8-1-6 when coating metal parts, since the unlimited VOC potential emissions from each of these units is less than twenty-five (25) tons per year when coating a substrate not otherwise regulated under 326 IAC 8, and each unit is subject to 326 IAC 8-2-9 when coating metal parts (Miscellaneous Metal and Plastic Coating Operations).

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
Paint Booths EU-03 and EU-04, are subject to this rule while coating metal, because each of these units coats metal and each has the potential to emit 15 lbs VOC/ day or more when coating metal.

(a) Pursuant to 326 IAC 8-2-9 (Metal and Plastic Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators at paint booths EU-03 and EU-04 shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(b) Based on the SDS submitted by the source and calculations made, Paint Booths EU-03 and EU-04 can comply with this requirement.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment at Paint Booths EU-03 and EU-04, 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 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 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.

Assemblies EU-01 and EU-02 are not subject to this rule. Although each unit has the potential to emit greater than 15 lbs/day when coating metal, the application of coating using aerosol spray is exempt from this rule according to guidance provided by the EPA in EPA Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, which indicates that aerosol coatings (sealants, adhesives, and floor preparation materials) are not included in miscellaneous metal parts or plastic parts coating categories. Based on this guidance, the requirements of this rule are not applicable to these facilities.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Assemblies EU-01 and EU-02, and Paint Booths EU-03 and EU-04 are not coating wood furniture or cabinets. Therefore, pursuant to 326 IAC 8-2-12(a), the requirements of this rule are not applicable to these facilities.

326 IAC 8-10 (Automobile Refinishing)
This source is not subject to 326 IAC 8-10 because this facility does not perform automobile refinishing as it is defined in 326 IAC 8-2-10(2)(5). Although the source coats mobile equipment, this source is not an auto body repair shop, production paint shop, new car dealer, fleet operation repair and paint shop, or a facility that coats under the SIC code 7532. Therefore, this rule does not apply to the source.

326 IAC 8-11 (Wood Furniture Coating)
Assemblies EU-01 and EU-02, and Paint Booths EU-03 and EU-041 are not coating wood parts. Therefore, pursuant to 326 IAC 8-11, the requirements of this rule are not applicable to these facilities.

326 IAC 8-17 (Industrial Solvent Cleaning Operations)
The source is not located in Lake or Porter County. Therefore, pursuant to 8-17-1(a)(1), this rule does not apply to this source.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)
The source is not located in Lake or Porter County. Therefore, pursuant to 8-22-1(a)(1), this rule does not apply to this source.

Welding

326 IAC 6-3-2 (Particulate Matter Emissions from Manufacturing Processes)
The welding stations located at each plant, EU-05 and EU-06, each consume less than six hundred twenty-five (625) pounds of wire per day (420 lbs/day). Therefore, pursuant to 326 IAC 6-3-1(b)(9), the requirements of 326 IAC 6-3-2 (Particulate Matter Emissions from Manufacturing Processes) are not applicable to these facilities.

Natural Gas Combustion

326 IAC 6-2 (Particulate Matter Emissions for Sources of Indirect Heating)
The insignificant natural gas-fired combustion sources are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2 (Particulate Matter Emissions for Sources of Indirect Heating) are not applicable to these facilities.

326 IAC 6-3-2 (Particulate Matter Emissions from Manufacturing Processes)
The insignificant natural gas-fired combustion sources are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The natural gas combustion units located at this source do not have a PTE of 25 tons per year or more. Therefore, pursuant to 326 IAC 7-1.1-1, this rule does not apply

326 IAC 9-1 (Carbon Monoxide Emission Limits)
Pursuant to 326 AIC 9-1-1(a), this rule does not apply to the source because it is not one of the listed sources in Section 2 of this rule.

Woodworking Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Since each line in the woodworking operations (WW-01 through WW-07) have 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), it is 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 devices, in order to assure the facilities are not subject to the

requirements of 326 IAC 6-3-2, the integral control devices shall be in operation and control emissions from the associated facilities at all times the facilities are in operation.

Facility or Process Description	PTE Prior to Integral Control (lbs/hr)	PTE After Integral Control (lbs/hr)
WW-01	7.732	0.077
WW-02	4.415	0.044
WW-03	4.415	0.044
WW-04	4.415	0.044
WW-05	4.415	0.044
WW-06	4.415	0.044
WW-07	4.415	0.044

Compliance Determination and Monitoring Requirements

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

(1) In order to ensure the requirements of 326 IAC 6-3-2 are not applicable to the woodworking operations, identified as WW-01 through WW-07, the baghouse and dust collectors for particulate control shall be in operation and control emissions from the associated woodworking processes at all times the woodworking operations (WW-01 through WW-07) is in operation.

(2) There are no testing requirements for this source.

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

Control	Parameter	Frequency
WW-01 through WW-07 Baghouse/ Dust Collectors	Baghouse Inspections	Semiannually

These monitoring conditions are necessary because the baghouses for the woodworking operations (WW-01 through WW-07) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Conclusion and Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. 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 September 18, 2018.

The operation of this stationary cargo trailer manufacturing source shall be subject to the conditions of the attached MSOP Renewal No. M039-40487-00431.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Thomas Uher, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-1782 or (800) 451-6027, and ask for Thomas Uher or (317) 233-1782.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
PTE Summary

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Single HAP*** **	**Total HAPs**
Trailer Assembly - EU-01 & EU-02	0.62	0.62	0.62	0.00	0.00	7.93	0.00	0.72	1.08
Paint Booths - EU-03 & EU-04	68.08	68.08	68.08	0.00	0.00	40.92	0.00	0.00	0.00
Woodworking** - EU-07	1.50	1.50	1.50	0.00	0.00	0.00	0.00	0.00	0.00
Welding - EU-05 & EU-06	0.99	0.99	0.00	0.00	0.00	0.00	0.00	0.00	9.03E-02
NG Combustion	0.08	0.30	0.30	0.02	4.00	0.22	3.36	1.36E-04	7.55E-02
Subtotal	**71.26**	**71.49**	**70.50**	**0.02**	**4.00**	**49.07**	**3.36**	**0.72**	**1.25**
Fugitive Emissions: Paved Roads	*3.37*	*0.67*	*0.17*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*
Total Emissions	**74.63**	**72.17**	**70.66**	**0.02**	**4.00**	**49.07**	**3.36**	**0.72**	**1.25**

** PM2.5 listed is direct PM2.5*
***After integral controls*
****Highest Single HAP = Toluene*

Appendix A: Emission Calculations
PTE Summary

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Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

	Trailer Assembly	Welding	NG Boilers & Heaters	Total
Benzene	-	-	8.40E-05	8.40E-05
Formaldehyde	-	-	3.00E-03	3.00E-03
Hexane	0.27	-	7.20E-02	0.34
Toluene	0.72	-	1.36E-04	0.72
Xylene	0.10	-	-	0.10
Dichlorobenzene	-	-	4.80E-05	4.80E-05
Lead	-	-	2.00E-05	2.00E-05
Cadmium	-	-	4.40E-05	4.40E-05
Chromium	-	-	5.60E-05	5.60E-05
Manganese	-	0.090283	1.52E-05	0.09
Nickel	-	-	8.40E-05	8.40E-05
Total HAPs	**1.08**	**0.09**	**0.08**	**1.25**
			Highest Single HAP (Toluene)	**0.72**

Appendix A: Emission Calculations
Trailer Assembly (Units EU-01, EU-02)

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

1. VOC and PM

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per Gallon of Coating less Water	Pounds VOC per gallon of coating	Potential VOC (lb/hour)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Gallons of Coating (gal/day)	Application Method	Transfer Efficiency	Substrate
TREMPRO 644 RTV CLEAR	8.47	1.00%	0.00%	1.00%	0.00%	0.0120	2.00	0.08	0.08	0.00	0.05	0.01	0.00	0.57	Caulk	100%	Metal
Manus Bond 76-AM Self Leveling	14.19	0.59%	0.00%	0.59%	0.00%	0.6522	2.00	0.08	0.08	0.11	2.61	0.48	0.00	31.31	Manual	100%	Wood
Q-320 HIGH STRENGTH FAST TACK ADHESIVE	5.62	81.69%	5.00%	76.69%	5.00%	0.0568	2.00	4.54	4.31	0.49	11.75	2.14	0.18	2.73	Aerosol	65%	Metal
ISOPROPYL ALCOHOL	6.57	100.00%	0.00%	100.00%	0.00%	0.0082	2.00	6.57	6.57	0.11	2.59	0.47	0.00	0.39	Wipe	100%	Metal
12 OZ BORING-SMITH BSI WEB 76 ADHESIVE L	4.10	54.60%	0.00%	54.60%	0.00%	0.0185	2.00	2.24	2.24	0.08	1.99	0.36	0.11	0.89	Aerosol	65%	Metal
1168 Semi Gloss Black Spray Paint	6.43	67.39%	24.23%	43.16%	24.23%	0.0036	2.00	3.66	2.77	0.02	0.48	0.09	0.02	0.17	Aerosol	65%	Metal
AHB Clear Thin Spread Adhesive	8.50	4.74%	0.00%	4.74%	0.00%	0.0082	2.00	0.40	0.40	0.01	0.16	0.03	0.00	0.39	Caulk	100%	Metal
MasterWeld 654	12.51	0.16%	0.00%	0.16%	0.00%	0.0997	2.00	0.02	0.02	0.00	0.10	0.02	0.00	4.79	Caulk	100%	Metal
Rollie Williams Toluene	5.34	100.00%	0.00%	100.00%	0.00%	0.0075	2.00	5.34	5.34	0.08	1.92	0.35	0.00	0.36	Wipe	100%	Metal
Silicone Spray, C-33	5.34	60.00%	0.00%	60.00%	0.00%	0.0002	2.00	3.20	3.20	0.00	0.03	0.01	0.00	0.01	Aerosol	65%	Metal
TREMPRO 645 ADHESIVE	8.55	2.90%	0.00%	2.90%	0.00%	0.0040	2.00	0.25	0.25	0.00	0.05	0.01	0.00	0.19	Caulk	100%	Metal
								Total Potential to Emit Per Unit:		**0.91**	**21.72**	**3.96**	**0.31**			
								Total Potential to Emit:		**1.81**	**43.45**	**7.93**	**0.62**			

Number of Assembly Lines:	**2**	
PTE when Coating Metal per Unit:	**0.35**	**0.06**
Total PTE when Coating Metal:	**0.70**	**0.13**
PTE when Coating Substrates not Otherwise Regulated by 326 IAC 8 per Unit:	**21.37**	**3.90**
Total PTE when Coating Substrates not Otherwise Regulated by 326 IAC 8:	**42.75**	**7.80**

Gallons of Surface Coatings per Day Not Otherwise Exempted Under 326 IAC 6-3-1(b)(5)-(8) **0.00**

METHODOLOGY

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

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.
- For Article 6 purposes "Surface Coating" is defined as the application of a solvent or waterbased coating to a surface that imparts protective, functional,or decorative films in which the application emits, or has the potential to emit, particulate. Therefore, coatings that do not have potential to emit particulate do not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and are not counted towards the gallons per day used and are not subject to 326 IAC 6-3-2.
- For Article 8-2-9 purposes: While aerosol coatings are not discussed in 326 IAC 8-2-9, the EPA Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, states that aerosol coatings (sealents, adhesives, and floor preparation materials) are not included in miscellaneous metal parts or plastic parts coating categories. Therefore, the aerosol coatings used in the miscellaneous coating usage operation and are not subject to the requirements of 326 IAC 8-2-9.
- For Article 8-2-9 purposes: Application of cleaning solvents/products to the final product to remove fingerprints, dust, etc..(i.e., not related to removing dried paint) are not considered surface coating operations.

Appendix A: Emission Calculations
HAP Emission Calculations (EU-01, EU-02)

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexane	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexane Emissions (ton/yr)
TREMPRO 644 RTV CLEAR	8.47	0.01	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Manus Bond 76-AM Self Leveling	14.19	0.65	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Q-320 HIGH STRENGTH FAST TACK ADHESIVE	5.62	0.06	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
ISOPROPYL ALCOHOL	6.57	0.01	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
12 OZ BORING-SMITH BSI WEB 76 ADHESIVE L	4.10	0.02	2.00	0.00%	0.00%	20.00%	0.00	0.00	0.13
1168 Semi Gloss Black Spray Paint	6.43	0.00	2.00	1.79%	3.95%	0.00%	0.00	0.01	0.00
AHB Clear Thin Spread Adhesive	8.50	0.01	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
MasterWeld 654	12.51	0.10	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Rollie Williams Toluene	5.34	0.01	2.00	0.00%	100.00%	0.00%	0.00	0.35	0.00
Silicone Spray, C-33	5.34	0.00	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
TREMPRO 645 ADHESIVE	8.55	0.00	2.00	15.00%	0.00%	0.00%	0.04	0.00	0.00
						Individual HAPs Per Unit:	**0.05**	**0.36**	**0.13**
						Total Individual HAPs:	**0.10**	**0.72**	**0.27**
						HAPs Per Unit:	**0.54**		
						Total HAPs:	**1.08**		

METHODOLOGY

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

Appendix A: Emission Calculations
Paint Booths (EU-03 & EU-04)

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

1. VOC and PM

Manufacturer	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempts	Weight % Organics	Volume % Water & Exempts	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per Gallon of Coating less Water & Exempts	Pounds VOC per gallon of coating	Potential VOC (lb/hour)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Gallons of Coating (gal/day)	Application Method	Transfer Efficiency	Substrate
Undercoat																		
	Z Guard 20060B-2 UT	11.58	17.05%	4.10%	12.95%	4.10%	0.9500	2.00	1.56	1.50	2.85	68.40	12.48	27.98	45.60	HVLP	65%	Metal
	Z Prime 3333 Red Oxide	9.01	61.00%	45.80%	15.20%	45.80%	0.0625	2.00	2.53	1.37	0.17	4.11	0.75	0.67	3.00	HVLP	65%	Metal
Topcoat																		
	Z Shield 6015 RR	9.01	61.00%	45.80%	15.20%	45.80%	0.5000	2.00	2.53	1.37	1.37	32.88	6.00	5.39	24.00	HVLP	65%	Metal
Clean Up Solvents																		
	TCI Mineral Spirits	6.34	100.00%	33.00%	67.00%	0.00%	0.0329	2.00	4.25	4.25	0.28	6.71	1.22	0.00	1.58	Wipe	100%	Metal
										Total Potential to Emit Per Unit:	**4.67**	**112.10**	**20.46**	**34.04**				
										Total Potential to Emit:	**9.34**	**224.20**	**40.92**	**68.08**				

Number of Paint Booths:	**2**	
PTE when Coating Metal per Unit:	**105.39**	**19.23**
Total PTE when Coating Metal:	**210.78**	**38.47**
PTE when Coating Substrates not Otherwise Regulated by 326 IAC 8 per Unit:	**0.00**	**0.00**
Total PTE when Coating Substrates not Otherwise Regulated by 326 IAC 8:	**0.00**	**0.00**
Gallons of Coating per day:	**72.60**	

METHODOLOGY

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

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.
- For Article 6 purposes "Surface Coating" is defined as the application of a solvent or waterbased coating to a surface that imparts protective, functional,or decorative films in which the application emits, or has the potential to emit, particulate. Therefore, coatings that do not have potential to emit particulate do not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and are not counted towards the gallons per day used and are not subject to 326 IAC 6-3-2.
- For Article 8-2-9 purposes: Application of cleaning solvents/products to the final product to remove fingerprints, dust, etc..(i.e., not related to removing dried paint) are not considered surface coating operations.

Appendix A: Emission Calculations
Paint Booths (EU-03 & EU-04)

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexane	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexane Emissions (ton/yr)
Undercoat									
Z Guard 20060B-2 UT	8.47	0.95	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Z Prime 3333 Red Oxide	14.19	0.06	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Topcoat									
Z Shield 6015 RR	6.57	0.50	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
Clean Up Solvents									
TCI Mineral Spirits	6.43	0.03	2.00	0.00%	0.00%	0.00%	0.00	0.00	0.00
						Individual HAP	**0.0**	**0.0**	**0.0**
						Total HAPs	**0.0**		

METHODOLOGY

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

Appendix A: Emission Calculations
Woodworking

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

Emission Unit	Control Device	Process/ Location	* Dust Collected per Line (lbs/hr)	Control Efficiency	Number of Lines	Uncontrolled PM/ PM10/ PM2.5		Controlled*** PM/ PM10/ PM2.5	
						lb/hr	tons/yr	lb/hr	tons/yr
WW-01	Baghouse	Panel Saw / Bldg 1	7.81	99.00%	1	7.732	33.87	0.077	0.34
WW-02	Jet DC-605M Dust Collector	Table Saw 1/ Bldg 1	4.46	99.00%	1	4.415	19.34	0.044	0.19
WW-03	Jet DC-605M Dust Collector	Table Saw 2/ Bldg 1	4.46	99.00%	1	4.415	19.34	0.044	0.19
WW-04	Jet DC-605M Dust Collector	Table Saw 3/ Bldg 1	4.46	99.00%	1	4.415	19.34	0.044	0.19
WW-05	Jet DC-605M Dust Collector	Table Saw 4/ Bldg 1	4.46	99.00%	1	4.415	19.34	0.044	0.19
WW-06	Jet DC-605M Dust Collector	Table Saw 1/ Bldg 2	4.46	99.00%	1	4.415	19.34	0.044	0.19
WW-07	Jet DC-605M Dust Collector	Table Saw 2/ Bldg 2	4.46	99.00%	1	4.415	19.34	0.044	0.19
					Total	**34.22**	**149.90**	**0.34**	**1.50**

METHODOLOGY
PTE PM/PM10 (lbs/hour) = [(Dust collected (lbs/unit) x Number of lines) / (control efficiency)] x (1- control efficiency)
PTE PM/PM10 (tons/year) = (PTE PM/PM10 (lbs/hour))*8760)/2000

NOTES
*PTE calculated using amount of dust collected at each control device.
** PM, PM10, and PM 2.5 emissions are assumed equal.
***Baghouse and Dust Collectors controlling emissions from woodworking operations are integral.

Appendix A: Emissions Calculations
Welding and Thermal Cutting (EU-05 & EU-06)

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Electrode consumption (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
(EU-05) Metal Inert Gas (MIG)(carbon steel)	25	0.833	499.8	0.0055	0.0005			0.115	0.010	0.000	0	0.010
(EU-06) Metal Inert Gas (MIG)(carbon steel)	17	1.2	489.6	0.0055	0.0005			0.112	0.010	0.000	0	0.010
EMISSION TOTALS												
Potential Emissions lbs/hr								0.23	0.02	0.00	0.00	0.02
Potential Emissions lbs/day								5.44	0.49	0.00	0.00	0.49
Potential Emissions tons/year								**0.99**	**0.09**	**0.00**	**0.00**	**0.09**

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is 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
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

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

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

Unit ID	Heat Capacity (MMBtu/hr)	Number of Units	Total Capacity (MMBtu/hr)
NG-01	0.16	42	6.72
NG-02	2.6	1	2.60
			9.32

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
9.32	1020	80.0

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.08	0.30	0.30	0.02	4.00	0.22	3.36

*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	8.4E-05	4.8E-05	3.0E-03	0.07	1.4E-04	**0.08**

	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	2.0E-05	4.4E-05	5.6E-05	1.5E-05	8.4E-05	**2.2E-04**
Methodology is the same as above.					**Total HAPs**	**0.08**
The five highest organic and metal HAPs emission factors are provided above.					**Worst HAP**	**0.07**

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Forest River, Inc. - US Cargo Division
Address City IN Zip: 17645 & 17830 Commerce Drive, Bristol, Indiana 46507
Permit No./Plt ID: 039-40487-00431
Reviewer: Thomas Uher
Date: 9/18/2018

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

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi Trailer (entering plant) (one-way trip)	34.0	1.0	34.0	35.0	1190.0	700	0.133	4.5	1645.3
Semi Trailer (leaving plant) (one-way trip)	34.0	1.0	34.0	13.0	442.0	700	0.133	4.5	1645.3
Forklift (exiting plant) (one-way)	1.0	8.0	8.0	1.5	12.0	700	0.133	1.1	387.1
Forklift (reentering plant) (one-way)	1.0	8.0	8.0	0.5	4.0	700	0.133	1.1	387.1
		Totals	**84.0**		**1648.0**			**11.1**	**4064.8**

Average Vehicle Weight Per Trip = 19.6 tons/trip
Average Miles Per Trip = 0.13 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	19.6	19.6	19.6	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.811	0.362	0.0889	lb/mile
Mitigated Emission Factor, Eext =	1.656	0.331	0.0813	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Semi Trailer (entering plant) (one-way trip)	1.36	0.27	0.07	1.36	0.27	0.07
Semi Trailer (leaving plant) (one-way trip)	1.36	0.27	0.07	1.36	0.27	0.07
Forklift (exiting plant) (one-way)	0.32	0.06	0.02	0.32	0.06	0.02
Forklift (reentering plant) (one-way)	0.32	0.06	0.02	0.32	0.06	0.02
Totals	**3.37**	**0.67**	**0.17**	**3.37**	**0.67**	**0.17**

Methodology

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 3, 2018

William Conway
Forest River, Inc. – US Cargo Division
PO Box 3030
Elkhart, IN 465153030

Re: Public Notice
Forest River, Inc. – US Cargo Division
Permit Level: MSOP Renewal
Permit Number: 039-40487-00431

Dear Mr. Conway:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Elkhart Truth in Elkhart, IN publish the abbreviated version of the public notice no later than December 5, 2018. 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 Bristol Washington Township Public Library, 505 West Vistula Street in Bristol, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Thomas Uher, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-1782 or dial (317) 233-1782.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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Governor

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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 30, 2018

Elkhart Truth
421 South Second Street
P.O. Box 487
Elkhart, Indiana 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Forest River, Inc. – US Cargo 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 December 5, 2018

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Theresa Weaver

Theresa Weaver
Permit Branch
Office of Air Quality

Permit Level: MSOP Renewal
Permit Number: 039-40487-00431

Enclosure

PN Newspaper Letter 8/22/2018

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 3, 2018

To: Bristol Washington Township Public Library

From: Jenny Acker, 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. – US Cargo Division
Permit Number: 039-40487-00431

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 1/9/2017

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Eric J. Holcomb
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Commissioner

Notice of Public Comment

December 3, 2018
Forest River, Inc. – US Cargo Division
039-40487-00431

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 Letter 1/9/2017

Mail Code 61-53

IDEM Staff	TAWEAVER 12/3/2018 FOREST RIVER INC U S CARGO DIVISON 039-40487-00431 (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 Conway FOREST RIVER INC U S CARGO DIVISON PO Box 3030 Elkhart IN 465153030 (Source CAATS)									
2		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
3		Bristol Town Council and Town Manager P.O. Box 305 Bristol IN 46507 *(Local Official)*									
4		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
5		Bristol Washington Township Public Library 505 West Vistula Street Bristol IN 46507-0789 *(Library)*									
6		Michael Furfaro DECA Environmental & Associates, Inc 410 1st Ave Carmel IN 46032 *(Consultant)*									
7		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 *(Affected Party)*									
8		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 *(Affected Party)*									
9											
10											
11											
12											
13											
14											
15											

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

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