NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Federally Enforceable State Operating Permit (FESOP)

for Forest River Sunseeker Complex in Elkhart County

FESOP Renewal No.: F039-41825-00126

The Indiana Department of Environmental Management (IDEM) has received an application from Forest River Sunseeker Complex, located at 55135 CR 1, 914 CR 1 & 902 CR 1, Elkhart, IN 46514, for a new source review and FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Forest River Sunseeker Complex to make certain changes at its existing source and to continue to operate its existing source.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Elkhart Public Library
300 S 20nd Street.
Elkhart, IN 46516

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 posted on IDEM’s website (https://www.in.gov/idem/5474.htm) 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 F039-41825-00126 in all correspondence.

Comments should be sent to:

William Altman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for William Altman or (317) 233-9664
Or dial directly: (317) 233-9664
Fax: (317) 232-6749 attn: William Altman
E-mail: WAltman@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](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](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, the Northern Regional Office, 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 William Altman of my staff at the above address.

[Signature]
Madhurima Das
Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Forest River Sunseeker Complex
914 CR 1 & 902 CR 1
Elkhart, Indiana 46514

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.
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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary bus, motor home, travel trailer, and trailer assembly source.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>914 CR 1 &amp; 902 CR 1, Elkhart, Indiana 46514</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 534-3030</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3713, 3715, 3792 (Truck and Bus Bodies, Truck Trailers, Travel Trailers and Campers)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program, Minor Source, under PSD Rules, Minor Source, Section 112 of the Clean Air Act, Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Plant 34 - 914 CR 1, Elkhart, IN 46514

(a) One (1) recreation vehicle (RV) assembly lines, identified as EU-1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 2.4 units per hour, coating plastic parts.

(b) Thirty-nine (39) natural gas-fired space heaters, located at plant 34, Identified as EU-2, with a heat input capacity of 1.04 million British thermal units per hour, each.

(c) Eighteen (18) metal inert gas (MIG) welding stations, located at plant 34, Identified as EU-3, with a maximum throughput capacity of 0.21 pounds of rod or wire per hour per station.

(d) One (1) hot melt rolling facility, identified as EU-4, constructed in 1999, exhausting inside, capacity: 2.4 units per hour, coating wood and plastic parts.

(e) Two (2) bead applicators, identified as EU-5, constructed in 1999, exhausting inside, capacity: 2.4 units per hour, each, coating wood and plastic parts.

Plant 68 - 902 CR 1, Elkhart, IN 46514

(f) One (1) recreation vehicle (RV) assembly line, identified as EU-6, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of two (2) motorized recreational vehicles per hour, using no control equipment, and exhausting indoors.
(g) One (1) woodworking operation, identified as WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.

(h) Three (3) natural gas-fired space heaters, located at plant 68, Identified as EU-7, approved in 2016 for construction, with a maximum heat input capacity of 0.83 MMBtu/hour, each, and exhausting indoors.

(i) Twelve (12) metal inert gas (MIG) welding stations, located at plant 68, identified as EU-8, with a maximum throughput capacity of 0.21 pounds of rod or wire per hour per station.

A.3 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F039-41825-00126, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(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 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
### B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

### B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

**(b)** A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

### B.12 Emergency Provisions [326 IAC 2-8-12]

**(a)** An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

**(b)** An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly
signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-41825-00126 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 nine (9) months 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

1. The changes are not modifications under any provision of Title I of the Clean Air Act;

2. Any approval required by 326 IAC 2-8-11.1 has been obtained;

3. The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

4. The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee’s copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 2-1.1-6]

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 2-8-4(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  Overall Source Limit  [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a)  Pursuant to 326 IAC 2-8:

(1)  The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2)  The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3)  The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b)  Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c)  This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d)  Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3  Opacity  [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

**Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]**

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
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 [326 IAC 2-8-4][326 IAC 2-8-5]
(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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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) 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.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 34 - 914 CR 1, Elkhart, IN 46514

(a) One (1) recreation vehicle (RV) assembly lines, identified as EU-1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 2.4 units per hour, coating plastic parts.

Plant 68 - 902 CR 1, Elkhart, IN 46514

(f) One (1) recreation vehicle (RV) assembly line, identified as EU-6, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of two (2) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.

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

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

Emission Limitations and Standards  [326 IAC 2-8-4(1)]

D.1.1 FESOP limits [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The VOC input to the RV assembly lines located at plant 34 and plant 68 shall be limited to be less than 75 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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

(a) Four and three-tenths (4.3) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings.

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

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

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

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

Pursuant to 326 IAC 8-2-9(f), the RV assembly lines shall comply with the following:

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

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

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

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

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

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

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

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

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

\[ A = \frac{\sum (c \times U)}{\sum U} \]

Where:

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

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

U is the usage rate of the coating in gallons per day.
D.1.6 Particulate Control

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

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

Compliance Monitoring Requirements  [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.7 Baghouse Inspections

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

D.1.8 Broken or Failed Bag Detection (Mandatory for operations with a baghouse)

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

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

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

Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of quarterly inspections.

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

D.1.10 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Forest River Sunseeker Complex
Source Address: 914 CR 1 & 902 CR 1, Elkhart, Indiana 46514
FESOP Permit No.: F039-41825-00126

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)___________________________________________________
☐ Affidavit (specify)______________________________________________________
☐ Other (specify)_________________________________________________________

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:__________________________
Printed Name:_______________________
Title/Position:_______________________
Date:_______________________________
This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency started:</td>
<td></td>
</tr>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Describe:</td>
<td></td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________  
Title / Position: ________________________________  
Date: ________________________________  
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Forest River Sunseeker Complex
Source Address: 914 CR 1 & 902 CR 1, Elkhart, Indiana 46514
FESOP Permit No.: F039-41825-00126
Facility: RV assembly lines at plant 34 and 68
Parameter: VOCs
Limit: Input of less than 75 tons per year

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
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</tr>
<tr>
<td>(tons)</td>
<td>(tons)</td>
<td>(tons)</td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ____________________________________________
Title / Position: _________________________________________
Signature: _____________________________________________
Date: ___________________________________________________
Phone: _________________________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
<th>Number of Deviations</th>
<th>Probable Cause of Deviation</th>
<th>Response Steps Taken</th>
</tr>
</thead>
<tbody>
<tr>
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<tbody>
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<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<tr>
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</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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</tbody>
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<th>Permit Requirement (specify permit condition #)</th>
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<td>Date of Deviation:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
</tr>
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<td>Response Steps Taken:</td>
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</tbody>
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<th>Permit Requirement (specify permit condition #)</th>
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<td>Date of Deviation:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Indian Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD) for a Minor State Operating Permit (MSOP) Transitioning to a Federally Enforceable State Operating Permit (FESOP) with New Source Review

**Source Description and Location**

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Forest River Sunseeker Complex</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>914 CR 1 &amp; 902 CR 1, Elkhart, IN 46514</td>
</tr>
<tr>
<td>County:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3713, 3715, and 3792 (Truck and Bus Bodies, Truck Trailers, Travel Trailers, and Campers)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>F039-41825-00126</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>William Altman</td>
</tr>
</tbody>
</table>

On August 21, 2019, the Office of Air Quality (OAQ) received an application from Forest River Sunseeker Complex related to the transition of a MSOP to a FESOP. The company has applied for the transition from a MSOP to a FESOP to accommodate higher production in the future.

**Source Definition**

This source consists of the following plants:

(a) Forest River, Inc. - Forest River - Plant 34 is located at 914 CR 1, Elkhart, Indiana, Plant ID: 039-00126; and

(b) Forest River, Inc. - Plant 68 is located at 902 CR 1, Elkhart, Indiana, Plant ID: 039-00126.

[Note: All emission units previously located in Plant 1 - 55135 CR 1 included in the current MSOP have been removed. Therefore, permitted emission units at Plant 1 - 55135 CR 1 have not been included in the FESOP].

The Forest River, Inc. - Plant 68 manufactures recreational vehicles. This plant is located across a railroad track from Forest River, Inc., Forest River - Plant 34.

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

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

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

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

The plants are located on properties that share a common border, separated by a railroad right-of-way. The plant properties are contiguous, meeting the third element of the source definition. The Forest River - Plant 34 and the Forest River, Inc. - Plant 68 meet all three parts of the source definition. Therefore, IDEM, OAQ has determined that these plants are part of the same source.

This determination was initially made under MSOP SPR No. 039-37254-00126, issued on September 29, 2016.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP Renewal No. M039-28511-00126, issued on December 18, 2009; and

(b) MSOP SPR No. 039-37254-00126, issued on September, 29, 2016.

Due to this application, the source is transitioning from a MSOP to a FESOP.

### County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ 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 NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) **PM₂.₅**

Elkhart County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

Elkhart County has been classified as attainment or unclassifiable in Indiana for all 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**

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.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

**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](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.

**Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River Sunseeker Complex on August 21, 2019, relating to the transition to a FESOP to accommodate higher production in the future.

The following is a list of the emission units and pollution control device(s):

**Plant 34 - 914 CR 1, Elkhart, IN 46514**

(a) One (1) recreation vehicle (RV) assembly line, identified as EU-1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 2.4 units per hour, coating plastic parts.

(b) Thirty-nine (39) natural gas-fired space heaters, located at plant 34, identified as EU-2, with a heat input capacity of 1.04 million British thermal units per hour, each.

(c) Eighteen (18) metal inert gas (MIG) welding stations, located at plant 34, identified as EU-3, with a maximum throughput capacity of 0.21 pounds of rod or wire per hour per station.

(d) Two (2) bead applicators, identified as EU-5, constructed in 1999, exhausting inside, capacity: 2.4 units per hour, each, coating wood and plastic parts.

In addition, the following permitted emission unit has been relocated to Plant 34 from Plant 9 - 914 CR 1:

(e) One (1) hot melt rolling facility, identified as EU-4, constructed in 1999, exhausting inside, capacity: 2.4 units per hour, coating wood and plastic parts.
Plant 68 - 902 CR 1, Elkhart, IN 46514

(f) One (1) recreation vehicle (RV) assembly line, identified as EU-6, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of two (2) motorized recreational vehicles per hour, using no control equipment, and exhausting indoors.

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

(h) Three (3) natural gas-fired space heaters, located at plant 68, identified as EU-7, approved in 2016 for construction, with a maximum heat input capacity of 0.83 MMBtu/hour, each, and exhausting indoors.

(i) Twelve (12) metal inert gas (MIG) welding stations, located at plant 68, identified as EU-8, with a maximum throughput capacity of 0.21 pounds of rod or wire per hour per station.

As part of this permitting action, the following emission units are being removed the source:

Plant 9 - 914 CR 1, Elkhart, IN 46514

(a) One (1) bus assembly operation, identified as Bus Assembly 1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting inside, capacity: 0.25 busses per hour or 6.00 busses per day, coating plastic parts.

Plant 1 - 55135 CR 1, Elkhart, IN 46514

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

(c) One (1) surface coating operation, identified as Bus Paint-1, located in Building E, constructed in 1999, consisting of one (1) blackout area and one (1) bus refinishing area, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to Stack BP-1, capacity: 0.083 metal busses per hour or 2.00 metal busses per day for blackout and 0.170 metal busses per hour or 4.00 metal busses per day for refinishing.

(d) Twenty-one (21) metal inert gas (MIG) welding stations, with a maximum throughput capacity of 0.21 pounds of rod or wire per hour per station.

“In 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 was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Enforcement Issues

There are no pending enforcement actions related to this source.
Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
<th>PM1</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP3</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>2.23</td>
<td>3.29</td>
<td>3.29</td>
<td>0.11</td>
<td>18.49</td>
<td>206.19</td>
<td>15.53</td>
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<td>100</td>
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<td>100</td>
<td>100</td>
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<td>250</td>
<td>250</td>
<td>250</td>
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</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM2.5 listed is direct PM2.5.
3Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is greater than one hundred (100) tons per year. The potential to emit of all other criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(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 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, this source is an area source under Section 112 of the Clean Air Act (CAA).
PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹ ²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>2.23</td>
<td>3.29</td>
<td>3.29</td>
<td>0.11</td>
<td>18.49</td>
<td>76.02</td>
<td>15.53</td>
<td>1.19</td>
<td>9.31</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹ Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."  
² PM₂.₅ listed is direct PM₂.₅.  
³ Single highest source-wide HAP  
* Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take VOC limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

(a) This existing stationary source is minor under Title V (326 IAC 2-7) because the potential to emit criteria pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing stationary source is minor under PSD (326 IAC 2-2) because the potential to emit of all PSD regulated pollutants from the entire source is less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for the RV assembly lines (EU-1 & EU-6) located at plant 34 and plant 68, because this source does not surface coat "automobiles" or "light duty trucks" as defined in 40 CFR 60.391

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.
National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85 are not included in the permit for the RV assembly operations (EU-1 & EU-6) located at plant 34 and plant 68, because this source does not surface coat “automobiles” or “light duty trucks” as defined in 40 CFR 60.391

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area sources, 40 CFR 63, Subpart HHHHHH is not included in the permit for this stationary bus, motor home, travel trailer, and trailer assembly source, since this source does not perform any paint stripping operations, refinishing operations, or spray application of coatings containing the target HAP.

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

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP VOC Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The VOC input to the RV assembly lines (EU-1 & EU-6) located at plant 34 and plant 68 shall be limited to be less than 75 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
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)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

| State Rule Applicability – Individual Facilities |

State rule applicability for this source has been reviewed as follows:

**RV assembly lines**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(b)(14), the RV assembly lines (EU-1 & EU6) are not subject to the requirements of 326 IAC 6-3, since they have potential to emit less than five hundred fifty-one thousandths (0.551) pound per hour, since these units perform caulking and application of sealants only with no overspray.

**326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)**

(a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the RV assembly lines are subject to the requirements of 326 IAC 8-2-9, since EU-1 was constructed in 1999 and EU-2 was constructed in 2016, located in Elkhart County, and has the unlimited PTE of VOC equal to or greater than 100 tons per year, and this source performs miscellaneous metal surface coating of RVs.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the RV assembly operation shall be not exceed for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for the RV assembly lines surface coating
operations.

(b) These RV assembly lines are also subject to the work practices specified under 326 IAC 8-2-9(f).

(c) 326 IAC 8-1-2 (Compliance Methods)
Pursuant to 326 IAC 8-1-2(a)(7), when using non-compliant coatings in the RV assembly lines, the source shall demonstrate compliance with the applicable 326 IAC 8-2-9 VOC content limitation(s), using a daily volume-weighted average of all coatings applied on a daily basis in the RV assembly lines.

Woodworking

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

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

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PTE Prior to Integral Device (lb/hr)</th>
<th>PTE After Integral Device (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking Operation (WW-1)</td>
<td>0.78</td>
<td>0.02</td>
</tr>
</tbody>
</table>

Welding

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the metal inert gas (MIG) welders (EU-3 & EU-8) are not subject to the requirements of 326 IAC 6-3, since these emission units have individual potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour.

Space Heaters
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the natural gas fired space heaters (EU-2 & EU-7) are not subject to the requirements of 326 IAC 6-3, since these emission units have individual potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

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

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

(2) When using non-compliant coatings, compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:
A = \left[ \sum (c \times U) / \sum U \right] 

Where:

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

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

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

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

<table>
<thead>
<tr>
<th>Emission Unit &amp; Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking operation WW-1 (baghouse)</td>
<td>Baghouse inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouse for the woodworking operation must operate properly to assure that the woodworking operation is exempt from the requirements of 326 IAC 6-3-2.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 21, 2019.

The construction of the proposed new emission units and the operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F039-41825-00126. The staff recommends to the Commissioner that the New Source Review and FESOP be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact William Altman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-9664 or (800) 451-6027, and ask for William Altman or (317) 233-9664.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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: Emissions Calculations

Source-wide Summary

Company Name: Forest River Sunseeker Complex
Address City IN Zip: 914 CR 1, and 902 CR 1, Elkhart, IN 46514
FESOP No.: F039-41825-0126
Reviewer: William Altman

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
<th>Uncontrolled/ unlimited Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NG Combustion (EU-2 &amp; EU-7)</td>
<td>0.35</td>
<td>1.40</td>
<td>1.40</td>
<td>0.11</td>
<td>18.49</td>
<td>1.02</td>
<td>15.53</td>
<td>0.35</td>
<td>0.33</td>
<td>Hexane</td>
</tr>
<tr>
<td>Welding (EU-3 &amp; EU-8)</td>
<td>0.15</td>
<td>0.15</td>
<td>0.15</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.01</td>
<td>0.01</td>
<td>Magnesium</td>
</tr>
<tr>
<td>Plant 34</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RV Assembly (EU-1)</td>
<td>0.48</td>
<td>0.48</td>
<td>0.48</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>97.19</td>
<td>2.05</td>
<td>0.87</td>
<td>Xylene</td>
</tr>
<tr>
<td>Plant 68</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RV Assembly (EU-6)</td>
<td>1.18</td>
<td>1.18</td>
<td>1.18</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>107.98</td>
<td>6.90</td>
<td>1.19</td>
<td>Toulene</td>
</tr>
<tr>
<td>Woodworking (WW-1)</td>
<td>73.58</td>
<td>12.26</td>
<td>12.26</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>75.75</td>
<td>15.48</td>
<td>15.48</td>
<td>0.11</td>
<td>18.49</td>
<td>15.53</td>
<td>9.31</td>
<td>1.19</td>
<td>Toulene</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential to Emit After Issuance (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>--------------------------------</td>
</tr>
<tr>
<td>NG Combustion (EU-2 &amp; EU-7)</td>
</tr>
<tr>
<td>Welding (EU-3 &amp; EU-8)</td>
</tr>
<tr>
<td>Plant 34</td>
</tr>
<tr>
<td>RV Assembly (EU-1)</td>
</tr>
<tr>
<td>Plant 68</td>
</tr>
<tr>
<td>RV Assembly (EU-6)</td>
</tr>
<tr>
<td>Woodworking (WW-1)(after integral control)</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>
### METHODOLOGY

1. **VOC and Particulate: Plant 34 Assembly**
   - This section outlines the methodology for emissions calculations, focusing on VOC and particulate matter. It includes formulas and data related to coating materials and their emissions.

2. **Material Density**
   - The table lists the density of various materials in pounds per gallon (lb/gal).

3. **Weight % (Volatile/H2O/Organics)**
   - Represents the percentage of volatile materials, water, and organic compounds in the coated materials.

4. **Weight % Water**
   - Shows the percentage of water content in the coating materials.

5. **Weight % Organics**
   - Indicates the percentage of organic materials in the coated materials.

6. **Volume %**
   - Refers to the percentage of volume in different forms.

7. **Volume % Non-Volatile Inside**
   - Denotes the percentage of non-volatile materials inside the coated materials.

8. **Volume % Non-Volatile Outside**
   - Represents the percentage of non-volatile materials outside the coated materials.

9. **Volume % Non-Volatile Total**
   - Indicates the overall percentage of non-volatile materials.

10. **Gal of Mat.**
    - Refers to the gallons of materials used.

11. **Maximum (units/hour)**
    - Indicates the maximum number of units per hour.

12. **Potential VOC Pounds per Hour**
    - Calculates the potential VOC pounds per hour.

13. **Potential VOC Pounds per Day**
    - Computes the potential VOC pounds per day.

14. **Potential VOC Tons per Year**
    - Determines the potential VOC tons per year.

15. **Total VOC Coated (lb/gal)**
    - Represents the total VOC coated in pounds per gallon.

16. **Transfer Efficiency**
    - Specifies the transfer efficiency of the coated materials.

17. **Type of Material Coated**
    - Identifies the type of material coated.

### Appendix A: Emissions Calculations

#### Plant 34 Assembly

- **Address City IN Zip:** 914 CR 1, and 902 CR 1, Elkhart, IN 46514
- **Company Name:** Forest River Sunseeker Complex
- **FESOP No.:** F339-16825-0126
- **Reviewer:** William Altman

- **Total = Worst Coating + Sum of all solvents used**
- **Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % Organics) / (Volume % solids)**

- **Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)**

- **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)**

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

Potential VOC pounds per hour can be calculated using the formula:

$$ \text{Potential VOC pounds per hour} = \text{Pounds of VOC per gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} $$

### VOCs and Particulate

**Plant 6 (Georgetown) RV Assembly Areas**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatile</th>
<th>Volume % Non-Volatile (kd)</th>
<th>Volume % Non-Volatile (kg)</th>
<th>Volume % Non-Volatile (metric)</th>
<th>Calculation Factor</th>
<th>Calculation Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bondaflex Sil 100GP translucent</td>
<td>2.98</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>GLOSS BLACK ENAMEL</td>
<td>8.57</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>Handi Foam</td>
<td>1.00</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>Non-Spray Application Products</td>
<td>0.00</td>
<td>100.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>LOCTITE UR 3370 WH known as LOCTITE 3370 POLYURETHANE</td>
<td>0.50</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>STA'-PUT Big Sticky Multi-Purpose Canister Adhesive</td>
<td>0.17</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
<tr>
<td>VAPE SPRAY</td>
<td>0.00</td>
<td>100.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.00</td>
</tr>
</tbody>
</table>

**Appendix A: Emissions Calculations**

- **Subtotal Uncontrolled 24.65, 591.69, 107.98, 1.18**

**Potential VOC pounds per day**

Potential VOC pounds per day can be calculated using the formula:

$$ \text{Potential VOC pounds per day} = \text{Potential VOC pounds per hour} \times \text{Maximum (units/hr)} $$

**Potential VOC tons per year**

Potential VOC tons per year can be calculated using the formula:

$$ \text{Potential VOC tons per year} = \text{Potential VOC pounds per day} \times \text{Maximum (units/hr)} \times \text{Number of days per year} $$

**Percentile Potential Tons per Hour**

Percentile Potential Tons per Hour can be calculated using the formula:

$$ \text{Percentile Potential Tons per Hour} = \text{Potential VOC pounds per hour} \times \text{Transfer efficiency} \times \text{PM 2.5 mass} \times \text{Number of tons per day} $$

**Total Weight Coating**

Total Weight Coating is the sum of all solvents used.
This methodology was used to determine the evaporation rate from the Forest River, Inc. Shasta facility (OAQ Permit #M039-33752-00094, issued January 27, 2010).

The evaporation rate was determined using an equation developed by the Society of Plastic Industry.

\[ \text{Pounds VOC per Gallon of Solids} = \left(\frac{\text{Density (lbs/gal) \times Weight \% organics}}{\text{Volume \% solids}}\right) \]

Particulate Potential Tons per Year = (units/hour) \times (gal/unit) \times (lbs/gal) \times (1- Weight \% Volatiles) \times (1-Transfer efficiency) \times (8760 hrs/yr) \times (1 ton/2000 lbs)

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

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

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

Potential VOC Pounds per Gallon Coating = (Density (lb/gal) \times Weight \% Organics)

Potential VOC Pounds per Gallon Coating less Water = (Density (lb/gal) \times Weight \% Organics) / (1-Volume \% water)

\[ \text{VOC tons/yr} = \text{VOC lbs/hr} \times (8760 \text{ hrs/1yr}) \times (1 \text{ ton/2000 lbs}) \]

\[ \text{VOC lbs/hr} = \text{VOC emission factor} \times \text{lbs per hour BS Black RV Foam} \]

\[ \text{Assume all VOC is MDI} \quad \text{VOC} = \text{HAP} \]

\[ \frac{\mu T}{MT Pto W} \]

\[ \mu = \mu_0 (\frac{\text{Density (lb/gal) \times Weight \% Organics}}{\text{Volume \% solids}}) \]

\[ W = \frac{1.331E-04 \text{ Evaporation rate pounds/hour}}{1.000E-03 \text{ Evaporation rate grams/second}} \]

\[ \text{4.107E-03 \text{ houry emissions} \times 8760 \text{ hours/year} \times (1 \text{ ton/2000 lbs}) = 4.380E-03 \text{ houry emissions} \times 8760 \text{ hours/year} \times (1 \text{ ton/2000 lbs}) = 0.78} \]

\[ \text{1.000E-03 \text{ ARALDITE MCU 7 RED US lbs per hour} \times W = 1.331E-04 \text{ Evaporation rate pounds/hour}} \]

\[ \text{1.68077E-05 \text{ Evaporation rate grams/second}} \]

\[ \text{4.107E-03 \text{ houry emissions} \times 8760 \text{ hours/year} = 4.380E-03 \text{ houry emissions} \times 8760 \text{ hours/year} = 0.78} \]

\[ \text{1.000E-03 \text{ UH-4036 Purple lbs per hour} \times W = 1.331E-04 \text{ Evaporation rate pounds/hour}} \]

\[ \text{1.68077E-05 \text{ Evaporation rate grams/second}} \]
Sikasil-N plus US clear
WD-40 Multi-Use Product Aerosol 6.81 0.02 - - - - - - -
Sikaflex-255 FC 9.92 0.28 0.50% - - 0.01 - - - -
LITE WEIGHT HAHN FUZION HARD TO BOND ADHESIVE 5.85 0.08 - - - - - - -
COLOR PUTTY OIL 17.50 0.01 - - - - - - -
Pure Grade Lacquer Thinner 7.09 0.03 65.00% 5.00% 5.00% 0.08 0.01 - 0.01 - - -
CASA Anti-Wick 8.43 0.29 - - - - - - -
Mineral Spirits 6.51 0.10 - - - - - - -
Handi-Cleaner Multi-Purpose Cleaner 6.68 CD 757 Heavy Duty Citrus Degreaser Aerosol
STA'-PUT Big Sticky Multi-Purpose Canister Adhesive 5.87 0.75 10.00% - - - - 0.33 - -
WD-40 Multi-Use Product Bulk Liquid 6.81 0.06 - - - - - - -
ISOPROPYL ALCOHOL 6.59 0.28 - - - - - - -
3M Primer 94 6.84 0.01 30.00% 5.00% - 0.01 0.00 - - - -
Colorflex CF8001 and All Colors 13.17 0.01 - - - - - - -
Bondaflex Sil 100GP translucent XtraBond 9550 SIL-BOND RTV 4500
NUFLEX 110 Gutter Seal, Butyl Rubber Sealant 11.02 0.04 2.00% 1.00% 1.00% - 0.00 0.00 - - 0.00 -
LOCTITE UR 3370 WH known as LOCTITE 3370 POLYURETHANE 10.01 0.04 20.00% - - - - - 0.03 - -
Loctite PL Premium Polyurethane Construction Adhesive Sensitive Adhesive
Adhesion Products AP-102 8.40 0.33 - - - - - - -
Silicone Spray
Sika Primer-206 G+P
GLOSS BLACK ENAMEL 6.48 0.01 4.83% 2.14% 0.00 - 0.00 - - - -
PVTMPP SSPR 6PK SPRAY N GO GLOSS BLK 104 6.23 0.10 20.00% 6.25% 1.75% 0.09 0.03 0.01 - - - -
OATEY CANADIAN STANDARD ABS YELLOW CEMENT 7.34 0.02 12.10% - - - - - 9.42E-05 - -
LOCTITE UR 8345RD known as MACROPLAST UR-8345RD

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

METHODOLOGY

The emission rates were determined using an equation developed by the Society of Plastic Industry.
This methodology was used to determine the emission rates from the Forest River, Inc. Sharon facility (OAQ Permit #M039-33752-00094, issued January 27, 2010).

\[
W = \frac{2.356 \times \text{A}}{\text{T}^{0.78}}
\]

\[
\text{Pounds of VOC} = \frac{\text{Pounds of VOC per Hour}}{1000} \times 24 \times 8760 \times 365
\]

\[
\text{Evaporation rate (grams/second)} = \frac{\text{Pounds of VOC per Gallon Coating} \times \text{Density (lb/gal) \times Usage Rate (gal/hr) \times \frac{8760}{8760} \times 2000 \times (1-Weight % Organics)}}{(1-Transfer efficiency) \times (1-Weight % Volatiles) \times \text{Exposed Area (m2)} \times \text{Air Speed Across the Curing Adhesive (m/seconds)} \times \text{Temperature (°C)}}
\]

\[
\text{Evaporation rate (grams/second)} = \frac{\text{Pounds of VOC per Gallon Coating} \times \text{Density (lb/gal) \times Usage Rate (gal/hr) \times (1-Weight % Organics)}}{(1-Transfer efficiency) \times (1-Weight % Volatiles) \times \text{Exposed Area (m2)} \times \text{Air Speed Across the Curing Adhesive (m/seconds)} \times \text{Temperature (°C)}}
\]

\[
\text{Potential to Emit Total HAPs (tons/year)} = \sum \text{Potential to Emit Single HAP (Ton/year)}
\]

\[
\text{Potential to Emit Total HAPs (tons/year)} = \sum \text{Potential to Emit Single HAP (Ton/year)}
\]

Address City IN Zip: 914 CR 1, and 902 CR 1, Elkhart, IN 46514
Company Name: Forest River Sunseeker Complex
Appendix A: Emission Calculations
HAPs from Surface Coating Operations-plant 68
Page 5 of 8 TSD App A
Reviewer: William Altman
HAPs from Surface Coating Operations-plant 68

Appendix A: Emission Calculations
HAPs from Surface Coating Operations-plant 68

Company Name: Forest River Sunseeker Complex
Address City IN Zip: 914 CR 1, and 902 CR 1, Elkhart, IN 46514
Reviewers: William Altman
Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/Hr <100

Company Name: Forest River Sunseeker Complex
Address City IN Zip: 914 CR 1, and 902 CR 1, Elkhart, IN 46514
FESOP No.: F039-41825-0126
Reviewer: William Altman

Plant 34 has thirty-nine (39) natural gas-fired space heaters, each with a maximum heat input capacity of 1.04 MMBtu/hour, each.
Plant 68 has three (3) natural gas-fired space heaters, each with a maximum heat input capacity of 0.83 MMBtu/hour, each.

Heat Input Capacity

<table>
<thead>
<tr>
<th>Plant 34</th>
<th>Plant 68</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heat Input Capacity</td>
<td>40.56 MMBtu/hr</td>
</tr>
<tr>
<td>Emission Factor (lb/MMCF)</td>
<td>PM</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>4.35</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.8E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.35</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.9E-04</td>
<td>2.2E-04</td>
<td>1.4E-02</td>
<td>0.33</td>
<td>8.3E-04</td>
<td>0.35</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>1.0E-03</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>9.2E-05</td>
<td>2.6E-04</td>
<td>2.8E-04</td>
<td>7.0E-05</td>
<td>3.9E-04</td>
<td>0.35</td>
</tr>
</tbody>
</table>

The five highest organic and metal HAPs emission factors are provided above.
Advd ADDITIONAL HAPs emission factors are available in AP-42, Chapter 1.4.
### Welding and Thermal Cutting

#### Appendix A: Emissions Calculations

**Company Name:** Forest River Sunseeker Complex  
**Address City IN Zip:** 914 CR 1, and 902 CR 1, Elkhart, IN 46514  
**FESOP No.:** F039-41825-0126  
**Reviewer:** William Altman

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WELDING</td>
<td></td>
<td></td>
<td>EMISSION FACTORS* (lb pollutant/lb electrode)</td>
<td>EMISSIONS (tons/yr)</td>
<td>HAPS (tons/yr)</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG) (carbon steel)</td>
<td>30</td>
<td>0.21</td>
<td>0.0055 0.0005</td>
<td>0.035 0.003 0.000 0.000 0.003</td>
<td></td>
</tr>
</tbody>
</table>

#### METHODOLOGY

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

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

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

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

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
## Appendix A: Emission Calculations

### Woodworking Operations

**Company Name:** Forest River Sunseeker Complex  
**Address City IN Zip:** 914 CR 1, and 902 CR 1, Elkhart, IN 46514  
**FESOP No.:** F039-41825-0126  
**Reviewer:** William Altman

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Efficiency (%)</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)</th>
<th>Gas or Air Flow Rate (acfm.)</th>
<th>PM Emission Rate before Controls (lb/hr)</th>
<th>PM Emission Rate before Controls (tons/yr)</th>
<th>PM Emission Rate after Controls* (lb/hr)</th>
<th>PM Emission Rate after Controls* (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW-1</td>
<td>98.00%</td>
<td>0.00073</td>
<td>2500</td>
<td>0.78</td>
<td>3.42</td>
<td>0.02</td>
<td>0.07</td>
</tr>
</tbody>
</table>

**Totals:**  
- PM Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)  
- PM Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Uncontrolled emissions**  
- Emission Rate in lbs/hr (before controls) = Emission Rate (after controls):  (lbs/hr)/(1-control efficiency)  
- Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

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

<table>
<thead>
<tr>
<th>Wood Processed per hour (lbs/hr)</th>
<th>Sawdust %</th>
<th>% Emissions per lb of Sawdust</th>
<th>Uncontrolled Emissions (lb/hr)</th>
<th>Uncontrolled Emissions (Tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM 14000</td>
<td>2.00%</td>
<td>6.00%</td>
<td>16.8</td>
<td>73.58</td>
</tr>
<tr>
<td>PM10 14000</td>
<td>2.00%</td>
<td>1.00%</td>
<td>2.8</td>
<td>12.26</td>
</tr>
</tbody>
</table>

PM = (Process weight rate lb/hour) * (Percent sawdust) * (Percent PM of sawdust) * (8,760 hr/year) * (1 ton/2000 lb)  
PM10 = (Process weight rate lb/hour) * (Percent sawdust) * (Percent PM10 of sawdust) * (8,760 hr/year) * (1 ton/2000 lb)

Weight calculations from similar operations shows conversion of 2% of the process rate weight of pre finished panels and lumber is converted into sawdust. Particle size analyses for RV woodworking operations shows that this sawdust is typically 6% particulate matter and 1% of it is PM10 (From Title V permit for Forest River, Topeka Complex #087-41087-000000).

* In October 1993, a Final Order Granting Summary Judgment was signed by an Administrative Law Judge (ALJ) resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and is integral to the normal operation of the facility, and therefore, potential emissions were to be calculated after consideration of the controls.
October 8, 2019

William Conway
Forest River Sunseeker Complex
PO Box 3030
Elkhart, IN 46515-3030

Re: Public Notice
Forest River Sunseeker Complex
Permit Level: FESOP w/ New Srce Rev
Permit Number: 039-41825-00126

Dear Mr. Conway:

Enclosed is a copy of your draft FESOP with New Source Review, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Elkhart Public Library, 300 South 2nd Street in Elkhart, 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 William Altman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-9664 or dial (317) 233-9664.

Sincerely,

Theresa Weaver
Theresa Weaver
Permits Branch
Office of Air Quality
October 8, 2019

To: Elkhart 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 Sunseeker Complex
Permit Number: 039-41825-00126

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

- Notice of a 30-day Period for Public Comment
- 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 Smiddle-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 updated 4/2019
Notice of Public Comment

October 8, 2019
Forest River Sunseeker Complex
039-41825-00126

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

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 4/12/2019
### Affix Stamp

HERE IF USED AS CERTIFICATE OF MAILING

### Name and address of Sender

<table>
<thead>
<tr>
<th>Line</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
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<th>Rest. Del. Fee</th>
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<tr>
<td>1</td>
<td>William Conway Forest River Sunseeker Complex PO Box 3030 Elkhart IN 465153030 (Source CAATS)</td>
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<tr>
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<td>Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)</td>
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<td>Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)</td>
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<td>Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)</td>
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<td>5</td>
<td>Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)</td>
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<td>6</td>
<td>Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)</td>
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<td>7</td>
<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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### Total number of pieces Listed by Sender

| 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 mail 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 insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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