NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Source Operating Permit (MSOP)

for Keystone Recreational Vehicle Company Plant 820 in LaGrange County

The Indiana Department of Environmental Management (IDEM) has received an application from Keystone Recreational Vehicle Company Plant 820, located at 0965 N 1150 W, Middlebury, IN 46540, for a transition from its Federally Enforceable State Operating Permit (FESOP) issued on November 16, 2010, to a MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Keystone Recreational Vehicle Company Plant 820 to make changes to its existing production rate and to continue to operate its existing source.

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

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

Middlebury Community Public Library
101 Winslow St.,
Middlebury, IN 46540

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 M087-41939-00062 in all correspondence.

Comments should be sent to:

Daria Antipova
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Daria Antipova or (317) 234-3429
Or dial directly: (317) 234-3429
Fax: (317) 232-6749 attn: Daria Antipova
E-mail: dantipov@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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

What will happen after IDEM makes a decision?

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

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

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Minor Source Operating Permit
OFFICE OF AIR QUALITY

Keystone Recreational Vehicle Company Plant 820
0965 N 1150 W
Middlebury, Indiana 46540

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

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

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

Operation Permit No.: M087-41939-00062
Master Agency Interest ID: 37148

Issued by: Brian Williams, Section Chief
Permits Branch
Office of Air Quality
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SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary travel trailer manufacturing facility.

| Source Address: | 0965 N 1150 W, Middlebury, Indiana 46540 |
| General Source Phone Number: | (574) 353-2145 |
| SIC Code: | 3792 (Travel Trailers and Campers) |
| County Location: | LaGrange |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program |
| Source Status: | Minor Source, under PSD and Emission Offset Rules |
| Source Status: | Minor Source, Section 112 of the Clean Air Act |
| Source Status: | Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

Chassis Frame and Floor Preparation Area

(a) One (1) chassis frame and floor preparation area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol cans and hand wiping, applying coatings to metal, wood, and plastic substrate with maximum capacity of less than five (5) gallons of coating per day, with emissions exhausting to general ventilation.

(b) One (1) woodworking operation in the chassis and floor preparation area, constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.

Cabinet and Mill Area

(c) One (1) cabinet and mill area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood substrates, with maximum capacity of less than five (5) gallons of coating per day, and exhausting to general ventilation.

(d) One (1) woodworking operation in the cabinet and mill area, constructed in 2005, with a maximum throughput rate of 1318 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.

Unit Assembly Area

(e) One (1) unit assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by hand wiping and brushing, applying coatings to wood, plastic, metal, and foam substrates, and exhausting to general ventilation.
(f) One (1) woodworking operation in the unit assembly area, constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by an integral portable baghouse, identified as PB1, and exhausting to stack F4.

(g) One (1) PVC pipe cutting operation in the unit assembly area, constructed in 2005, with a maximum throughput rate of 10 pounds of PVC pipe per hour, controlled by a portable baghouse, identified as PB2, and exhausting to stack F4.

Final Finish and Repair Area

(h) One (1) final finish and repair area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood, plastic, metal, and glass substrates, and exhausting to general ventilation.

Slide-out Area

(i) One (1) slide out assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to metal and wood substrate, and exhausting to general ventilation.

(j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and/or woodworking operations.

Combustion related activities

(k) Three (3) natural gas-fired thermocyclers, identified as F1 through F3, constructed in 2005, with the heat input rate of 0.6 MMBtu/hr per each unit.

(l) Paved roads and parking lots with public access.
SECTION B  GENERAL CONDITIONS

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

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

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

(a) This permit, M087-41939-00062, 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

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

B.5  Severability

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

B.6  Property Rights or Exclusive Privilege

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

B.7  Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M087-41939-00062 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

B.14 Source Modification Requirement

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

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

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

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

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

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

### Entire Source

<table>
<thead>
<tr>
<th>Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]</th>
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<tbody>
<tr>
<td>C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]</td>
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<tr>
<td>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.</td>
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<tr>
<th>C.2 Permit Revocation [326 IAC 2-1.1-9]</th>
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<tbody>
<tr>
<td>Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:</td>
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<tr>
<td>(a) Violation of any conditions of this permit.</td>
</tr>
<tr>
<td>(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.</td>
</tr>
<tr>
<td>(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.</td>
</tr>
<tr>
<td>(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.</td>
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<tr>
<td>(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.</td>
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<tr>
<th>C.3 Opacity [326 IAC 5-1]</th>
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<tbody>
<tr>
<td>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:</td>
</tr>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.4 Open Burning [326 IAC 4-1][IC 13-17-9]</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>
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 IG-CN 1003
Indianapolis, Indiana 46204-2251

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the
demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.8 Performance Testing  [326 IAC 3-6]
(a) For performance testing required by this permit, a test protocol, except as provided
elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days
prior to the actual test date.

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

Compliance Requirements  [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure
compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any
monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved
by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring  [326 IAC 2-1.1-11]
Compliance with applicable requirements shall be documented as required by this permit. The
Permittee shall be responsible for installing any necessary equipment and initiating any required
monitoring related to that equipment. All monitoring and record keeping requirements not already
legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]
(a) When required by any condition of this permit, an analog instrument used to measure a
parameter related to the operation of an air pollution control device shall have a scale
such that the expected maximum reading for the normal range shall be no less than
twenty percent (20%) of full scale. The analog instrument shall be capable of measuring
values outside of the normal range.
(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. initial inspection and evaluation;
2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. monitoring results;
2. review of operation and maintenance procedures and records; and/or
3. inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

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

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

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

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

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

Emissions Unit Description:

(b) One (1) woodworking operation in the chassis and floor preparation area, constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.

(d) One (1) woodworking operation in the cabinet and mill area, constructed in 2005, with a maximum throughput rate of 1318 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.

(f) One (1) woodworking operation in the unit assembly area, constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by an integral portable baghouse, identified as PB1, and exhausting to stack F4.

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

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

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for woodworking operations and the associated integral baghouses. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.2 Particulate Control [326 IAC 2-1.1-11]

(a) In order to assure the woodworking operations are not subject to the requirements of 326 IAC 6-3-2, the integral baghouses for particulate control, identified as DC and PB1, shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

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

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

D.1.3 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust in the woodworking operations in the chassis and floor preparation area and the cabinet and mill area shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether the emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part
of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.4 Broken or Failed Bag Detection

(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 C - Response to Excursions or Exceedances).

(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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

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

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.3, the Permittee shall maintain daily records of the visible emission notations of the woodworking operations stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) chassis frame and floor preparation area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol cans and hand wiping, applying coatings to metal, wood, and plastic substrate with maximum capacity of less than five (5) gallons of coating per day, with emissions exhausting to general ventilation.

(c) One (1) cabinet and mill area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood substrates, with maximum capacity of less than five (5) gallons of coating per day, and exhausting to general ventilation.

(e) One (1) unit assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by hand wiping and brushing, applying coatings to wood, plastic, metal, and foam substrates, and exhausting to general ventilation.

(h) One (1) final finish and repair area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood, plastic, metal, and glass substrates, and exhausting to general ventilation.

(i) One (1) slide out assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to metal and wood substrate, and exhausting to general ventilation.

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

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

D.2.1 VOC Minor Limit  [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall comply with the following:

(a) The VOC input, when coating substrates not otherwise regulated under 326 IAC 8, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, shall limit the potential to emit VOC from the unit assembly area operation to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

D.2.2 Preventive Maintenance Plan  [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC limitation contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limitation established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(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.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The total weight of VOC emitted for each compliance period.

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

D.2.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.2.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch

Quarterly Report

Source Name: Keystone Recreational Vehicle Company Plant 820  
Source Address: 0965 N 1150 W, Middlebury, Indiana 46540  
MSOP Permit No.: M087-41939-00062  
Facility: Unit Assembly Area  
Parameter: VOC input  
Limit: The VOC input, when coating substrates not otherwise regulated under 326 IAC 8, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<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>
</tr>
</thead>
<tbody>
<tr>
<td>VOC Input Tons</td>
<td>VOC Input Tons</td>
<td>VOC Input Tons</td>
<td></td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
## MINOR SOURCE OPERATING PERMIT
### ANNUAL NOTIFICATION

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

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Keystone Recreational Vehicle Company Plant 820</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>0965 N 1150 W</td>
</tr>
<tr>
<td>City:</td>
<td>Middlebury, Indiana 46540</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(574) 353-2145</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M087-41939-00062</td>
</tr>
</tbody>
</table>

I hereby certify that Keystone Recreational Vehicle Company Plant 820 is:
- [ ] still in operation.
- [ ] no longer in operation.

I hereby certify that Keystone Recreational Vehicle Company Plant 820 is:
- [ ] in compliance with the requirements of MSOP M087-41939-00062.
- [ ] not in compliance with the requirements of MSOP M087-41939-00062.

**Authorized Individual (typed):**

**Title:**

**Signature:**

**Date:**

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

**Noncompliance:**
MALFUNCTION REPORT

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

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6.4.


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

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

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

COMPANY:______________________________________________________ PHONE NO. (_______)___________________

LOCATION: (CITY AND COUNTY)__________________________________________________________________________

PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:__________

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:________________________________________

_____________________________________________________________________________________________________

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _______________________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS:______________________________________________________________

___________________________________________________________________________________________________

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____________________________________

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____________________________________

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:__________________________

INTERIM CONTROL MEASURES: (IF APPLICABLE)____________________________________________________________

_____________________________________________________________________________________________________

MALFUNCTION REPORTED BY:__________________________________ TITLE:____________________________________

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_______________________ DATE:__________________ TIME:__________________

*SEE PAGE 2

PAGE 1 OF 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

________________________________________________________________________
________________________________________________________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a FESOP Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Keystone Recreational Vehicle Company Plant 820</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>0965 N 1150 W, Middlebury, Indiana 46540</td>
</tr>
<tr>
<td>County:</td>
<td>LaGrange</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3792 (Travel Trailers and Campers)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>M087-41939-00062</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Daria Antipova</td>
</tr>
</tbody>
</table>

On September 19, 2019, the Office of Air Quality (OAQ) received an application from Keystone Recreational Vehicle Company Plant 820 (previously Dutchmen Manufacturing, Inc.) related to the transition of a FESOP to a MSOP.

Existing Approvals

The source has been operating under FESOP No. F087-29026-00062, issued on November 16, 2010. There have been no subsequent approvals issued.

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

County Attainment Status

The source is located in LaGrange 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 or attainment effective December 13, 2009, for the 24-hour PM₁₀ standard.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (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. LaGrange 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

LaGrange 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

LaGrange 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.

<table>
<thead>
<tr>
<th>Fugitive Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Greenhouse Gas (GHG) Emissions</th>
</tr>
</thead>
</table>
| 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. |

<table>
<thead>
<tr>
<th>Background and Description of Emission Units and Pollution Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Office of Air Quality (OAQ) has reviewed an application, submitted by Keystone Recreational Vehicle Company Plant 820 on September 19, 2019, relating to an increase to the maximum production rate based on the changing types of units constructed and the raw materials used at the source. Despite the increase in production rate the unlimited potential to emit VOC for the entire source will still decrease. The changes resulted in a transition from a FESOP to a MSOP. There are no new emissions units involved in this transition.</td>
</tr>
<tr>
<td>The following is a list of the emission units and pollution control device(s):</td>
</tr>
<tr>
<td><strong>Chassis Frame and Floor Preparation Area</strong></td>
</tr>
<tr>
<td>(a) One (1) chassis frame and floor preparation area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol cans and hand wiping, applying coatings to metal, wood, and plastic substrate with maximum capacity of less than five (5) gallons of coating per day, with emissions exhausting to general ventilation.</td>
</tr>
<tr>
<td>(b) One (1) woodworking operation in the chassis and floor preparation area, constructed in 2005, with a maximum throughput rate of 312 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.</td>
</tr>
</tbody>
</table>
Cabinet and Mill Area

(c) One (1) cabinet and mill area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood substrates, with maximum capacity of less than five (5) gallons of coating per day, and exhausting to general ventilation.

(d) One (1) woodworking operation in the cabinet and mill area, constructed in 2005, with a maximum throughput rate of 1,318 pounds of wood per hour, controlled by an integral baghouse, identified as DC, and exhausting to stack P1.

Unit Assembly Area

(e) One (1) unit assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by hand wiping and brushing, applying coatings to wood, plastic, metal, and foam substrates, and exhausting to general ventilation.

(f) One (1) woodworking operation in the unit assembly area, constructed in 2005, with a maximum throughput rate of 40 pounds of wood per hour, controlled by an integral portable baghouse, identified as PB1, and exhausting to stack F4.

(g) One (1) PVC pipe cutting operation in the unit assembly area, constructed in 2005, with a maximum throughput rate of 10 pounds of PVC pipe per hour, controlled by a portable baghouse, identified as PB2, and exhausting to stack F4.

Final Finish and Repair Area

(h) One (1) final finish and repair area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to wood, plastic, metal, and glass substrates, and exhausting to general ventilation.

Slide-out Area

(i) One (1) slide out assembly area, constructed in 2005, with a maximum throughput rate of 3.0 trailers per hour, with materials applied by aerosol spray cans and hand wiping, applying coatings to metal and wood substrate, and exhausting to general ventilation.

(j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and/or woodworking operations.

Combustion related activities

(k) Three (3) natural gas-fired thermocyclers, identified as F1 through F3, constructed in 2005, with the heat input rate of 0.6 MMBtu/hr per each unit.

(l) Paved roads and parking lots with public access.
“Integral Part of the Process” Determination

As part of FESOP No. F087-21758-00062, issued on January 6, 2006, IDEM, OAQ previously determined that baghouse is an integral part of the woodworking operations in the chassis and floor preparation area and the cabinet and mill area.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential to emit PM, PM10, and PM2.5 from the woodworking operations in the chassis and floor preparation area and the cabinet and mill area will continue to be calculated after the baghouse for purposes of determining permitting level and applicability of 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Operating conditions in the proposed permit will specify that the baghouse shall operate at all times when the woodworking operations in the chassis and floor preparation area and the cabinet and mill area are in operation.

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

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 – MSOP

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>PM$^{1,3}$</th>
<th>PM$_{10}^{1,3}$</th>
<th>PM$_{2.5}^{1,2,3}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chassis Frame and Floor Preparation Area</td>
<td>0.18</td>
<td>0.18</td>
<td>0.18</td>
<td>--</td>
<td>--</td>
<td>2.00</td>
<td>--</td>
<td>0.16</td>
</tr>
<tr>
<td>Cabinet and Mill Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>0.48</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Unit Assembly Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>33.99</td>
<td>--</td>
<td>1.83</td>
</tr>
<tr>
<td>Slide-out Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>1.62</td>
<td>--</td>
<td>0.22</td>
</tr>
<tr>
<td>Final Finish and Repair Area</td>
<td>0.28</td>
<td>0.28</td>
<td>0.28</td>
<td>--</td>
<td>--</td>
<td>9.90</td>
<td>--</td>
<td>1.01</td>
</tr>
<tr>
<td>Woodworking and PVC Operations</td>
<td>2.69</td>
<td>2.69</td>
<td>2.69</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>0.01</td>
<td>0.06</td>
<td>0.06</td>
<td>0.005</td>
<td>0.77</td>
<td>0.04</td>
<td>0.65</td>
<td>0.01</td>
</tr>
<tr>
<td>Welding Operations</td>
<td>0.003</td>
<td>0.003</td>
<td>0.003</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>0.718</td>
<td>0.144</td>
<td>0.035</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including</strong></td>
<td><strong>3.89</strong></td>
<td><strong>3.36</strong></td>
<td><strong>3.25</strong></td>
<td><strong>0.005</strong></td>
<td><strong>0.77</strong></td>
<td><strong>48.03</strong></td>
<td><strong>0.65</strong></td>
<td><strong>3.24</strong></td>
</tr>
<tr>
<td><strong>Source-Wide Fugitives</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></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>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt;100</td>
<td>&lt;25</td>
</tr>
</tbody>
</table>

1 Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a “regulated air pollutant.”
2 PM$_{2.5}$ listed is direct PM$_{2.5}$.
3 The baghouses controlling emissions for the woodworking operation are integral to the process.
*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 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The potential to emit of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

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

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

**New Source Performance Standards (NSPS):**

(a) The requirements New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit because the source does not meet the definition of an automobile or light duty truck assembly plant. This source operates a non-motorized travel trailer. Therefore, 40 CFR 60, Subpart MM does not apply.

(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):**

(c) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III (326 IAC 20-85) are not included in the permit since the source is not a major source of HAPs and does not surface coat automobiles or light-duty trucks. This source operates a non-motorized travel trailer.

(d) The requirements for the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit since the source is not a major source of HAPs.

(e) The requirements for the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHHH, are not included in the permit since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, is not an automobile refinishing operation, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.

(f) The requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit, since the source is not one of the nine source categories listed in 40 CFR 63.11514, and the application of the metal finishing HAP is not spray-applied painting as defined in 40 CFR 63.11522.

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

**Compliance Assurance Monitoring (CAM):**

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

State Rule Applicability - Entire Source

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

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.
326 IAC 2-2 (PSD)
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:

(1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
(2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

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 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)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. 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)
This source (located in LaGrange County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide unlimited PTE of PM is less than 10 tons per year; therefore, the source-wide actual emissions of PM are less than 10 tons per year. This source is not subject to the requirements of 326 IAC 6.5 because the source-wide PTE of PM is less than 100 tons per year and source-wide actual emissions of PM are less than 10 tons per year.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in LaGrange County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.
State rule applicability for this source has been reviewed as follows:

### Chassis Frame and Floor Preparation Area

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

Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 do not apply to the surface coating operations in the chassis frame and floor preparation area because this operation does not use more than five (5) gallons of coating per day.

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

When surface coating plastic, the requirements of 326 IAC 8-1-6 are not applicable to the chassis frame and floor preparation area because the unit does not have potential emissions greater than twenty-five (25) tons of VOCs per year.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

When surface coating metal, the requirements of 326 IAC 8-2-9 do not apply to the chassis frame and floor preparation area even though the facility was constructed after July 1, 1990 because the facility has potential VOC emissions of less than 15 pounds per day.

**326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

When surface coating wood, the requirements of 326 IAC 8-2-12 do not apply to the chassis frame and floor preparation area because the source is not coating wood furniture or cabinets.

### Cabinet and Mill Area

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

Pursuant to 326 IAC 6-3-1(b)(7), the requirements of 326 IAC 6-3-2 do not apply to the surface coating operations in the cabinet and mill area when surface coating wood because this operation uses flow coating, which does not generate particulate matter emissions.

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

The requirements of 326 IAC 8-1-6 are not applicable to the cabinet and mill area because the unit does not have potential emissions greater than twenty-five (25) tons of VOCs per year.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

The requirements of 326 IAC 8-2-9 are not applicable to the cabinet and mill area though the facility was constructed after July 1, 1990, because there is no coating of metal parts in the cabinet and mill area. Only coating of wood occurs in the cabinet and mill area. Also, the facility has potential VOC emissions of less than fifteen (15) pounds per day.

**326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-12 do not apply to the cabinet and mill area, because, though the source was constructed after July 1, 1990, these facilities have potential emissions of VOC of less than fifteen (15) pounds per day.

### Unit Assembly Area

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

Pursuant to 326 IAC 6-3-1(b)(8), the requirements of 326 IAC 6-3-2 do not apply to the surface coating operations in the unit assembly area because that operation uses brushing and hand coating methods which does not generate particulate matter emissions.

**326 IAC 8-1-6 (General Reduction Requirements for New Facilities)**

The unlimited potential emissions of VOC from the unit assembly area are greater than twenty-five (25) tons per year when surface coating plastic and foam. However, the source shall limit the VOC potential...
emissions from the unit assembly area to less than twenty-five (25) tons per year. Therefore the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the VOC input, when coating substrates not otherwise regulated under 326 IAC 8, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, shall limit the potential to emit VOC from the unit assembly area operation to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
The requirements of 326 IAC 8-2-9 are not applicable to the surface coating of metal in the unit assembly area even though the source was constructed after the applicability date of July 1, 1990 and the unit does have actual VOC emissions greater than fifteen (15) pounds per day because the materials used in the unit assembly area which emit VOCs are sealants, epoxies, and cleaners. The application of these types of products are not considered application of "surface coatings", which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The requirements of 326 IAC 8-2-12 do not apply to the cabinet and mill area because the source is not coating wood furniture or kitchen, bath or vanity cabinets.

Final Finish and Repair

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(12), the requirements of 326 IAC 6-3-2 do not apply to the surface coating operations in the final finish and repair area because that operation uses aerosol and hand coating methods which are exempt from the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The requirements of 326 IAC 8-1-6 are not applicable to the surface coating in the final finish and repair area because the unit does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
The requirements of 326 IAC 8-2-9 are not applicable to the surface coating in the final finish and repair area when painting metal because the application of sealants, epoxies, and cleaners is not considered an application of "surface coatings", which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
When surface coating wood, the requirements of 326 IAC 8-2-12 do not apply to the final finish and repair area because the source is not coating wood furniture or cabinets.

Slide-out Assembly Area

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(12), the requirements of 326 IAC 6-3-2 do not apply to the surface coating operations in the final finish and repair area because that operation uses aerosol and hand coating methods which are exempt from the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The requirements of 326 IAC 8-1-6 are not applicable to the surface coating in the slide-out assembly area because the unit does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.
326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
The requirements of 326 IAC 8-2-9 are not applicable to the surface coating in the slide-out assembly area when coating metal because the application of sealants, epoxies, and cleaners is not considered application of surface coatings, which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
When surface coating wood, the requirements of 326 IAC 8-2-12 do not apply to the slide-out assembly area because the source is not coating wood furniture or cabinets.

PVC Operation

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential to emit particulate matter is less than five hundred fifty-one thousandths (0.551) pound per hour for the PVC pipe cutting operation in the unit assembly area. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply.

Woodworking Operation

Since the following woodworking operations in the chassis and floor preparation area and the cabinet and mill area are in operation area have potential emissions less than 0.551 pound per hour after consideration of the integral control device, pursuant to 326 IAC 6-3-1(b)(14), they are exempt from the requirements of 326 IAC 6-3-2.

However, since the chassis frame and floor preparation area/cabinet and mill area has potential emissions greater than 0.551 pound per hour prior to consideration of the integral control device(s), in order to assure the Facility(s) and/or Process(s) are not subject to the requirements of 326 IAC 6-3-2, the integral control device shall be in operation and control emissions from the woodworking operations in the chassis and floor preparation area and the cabinet and mill area are in operation.

<table>
<thead>
<tr>
<th>Facility or Process Description</th>
<th>Emission Unit ID</th>
<th>PTE Prior to Integral Device (lb/hr)</th>
<th>PTE After Integral Device (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chassis Frame and Floor Preparation Area/Cabinet and Mill Area</td>
<td>DC</td>
<td>746</td>
<td>0.149</td>
</tr>
<tr>
<td>Assembly and Final Finish Areas</td>
<td>PB1</td>
<td>0.461</td>
<td>0.005</td>
</tr>
</tbody>
</table>

In order to assure the woodworking operations in the chassis and floor preparation area, and the cabinet and mill area are not subject to the requirements of 326 IAC 6-3-2, the integral baghouses, identified as DC, and PB1, for particulate control shall be in operation and control emissions from the woodworking operations at all times the chassis and floor preparation area and the cabinet and mill area are in operation.

Welding

326 IAC 6-3 (Particulate Emissions for Manufacturing Processes)
The requirements of 326 IAC 6-3-1(9) (Particulate Emissions for Manufacturing Processes) are not applicable to the welding operations at this source because the operation consumes less than 625 pounds of rod or wire per day.

Natural Gas Combustion Sources

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The requirements of 326 IAC 6-2 are not applicable to the three (3) natural gas-fired thermocycler air rotation units because they are not sources of indirect heating.
**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations: Applicability)**
The requirements of 326 IAC 7-1.1 are not applicable to this source because the natural gas-fired thermocycler air rotation units have potential emissions less than twenty-five (25) tons per year and actual emissions of less than ten (10) pounds per hour.

**326 IAC 9-1 (Carbon Monoxide Emission Limits)**
The requirements of 326 IAC 9-1 do not apply to the facility, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

**326 IAC 10-1-1 (Nitrogen Oxides Control)**
The combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because they have potential to emit NOx less than forty (40) tons per year.

### Compliance Determination and Monitoring Requirements

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

   (1) The woodworking operations:

   (A) In order to assure the woodworking operations is exempt from the requirements of 326 IAC 6-3-2, the baghouses (DC and PB1) for particulate control shall be in operation and control emissions from the woodworking operations at all times the chassis and floor preparation area, and the cabinet and mill area is in operation.

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

<table>
<thead>
<tr>
<th>Emission Unit/Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking in the Chassis Frame and Floor Preparation (Stack P1)</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Normal-Abnormal</td>
</tr>
<tr>
<td>Woodworking in the Cabinet and Mill Area (Stack P1)</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Normal-Abnormal</td>
</tr>
<tr>
<td>Woodworking in the Unit Assembly Area (PB 1)</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Normal-Abnormal</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the exhaust stack for the Woodworking operations in the Chassis Frame and Floor preparation Area, in the Cabinet and Mill Area, and in the Unit Assembly Area, Stack P1, must operate properly to assure the requirements of 326 IAC 6-3-2 do not apply.

### 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 September 19, 2019. Additional information was received on September 27, 2019.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M087-41939-00062. The staff recommends to the Commissioner that the MSOP be approved.
(a) If you have any questions regarding this permit, please contact Daria Antipova, 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) 234-3429 or (800) 451-6027, and ask for Daria Antipova or (317) 234-3429.

(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

#### Emissions Summary

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

#### Uncontrolled Emissions - Plant 820

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>HAPs</th>
<th>Single Worst HAP</th>
<th>HAP Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chassis Frame and Floor Preparation Area</td>
<td>0.18</td>
<td>0.18</td>
<td>0.18</td>
<td>--</td>
<td>--</td>
<td>2.00</td>
<td>--</td>
<td>0.16</td>
<td>0.12</td>
<td>Xylene</td>
</tr>
<tr>
<td>Cabinet and Mill Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>0.48</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Unit Assembly Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>33.99</td>
<td>--</td>
<td>1.83</td>
<td>0.74</td>
<td>Glycol Ethers</td>
</tr>
<tr>
<td>Slide-out Area</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>1.62</td>
<td>--</td>
<td>0.22</td>
<td>0.16</td>
<td>Xylene</td>
</tr>
<tr>
<td>Final Finish and Repair Area</td>
<td>0.28</td>
<td>0.28</td>
<td>0.28</td>
<td>--</td>
<td>--</td>
<td>9.90</td>
<td>--</td>
<td>1.01</td>
<td>0.72</td>
<td>Isocyanates</td>
</tr>
<tr>
<td>Woodworking and PVC Operations</td>
<td>2.69</td>
<td>2.69</td>
<td>2.69</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>0.01</td>
<td>0.06</td>
<td>0.06</td>
<td>0.005</td>
<td>0.77</td>
<td>0.04</td>
<td>0.65</td>
<td>0.01</td>
<td>0.01</td>
<td>n-Hexane</td>
</tr>
<tr>
<td>Welding Operations</td>
<td>0.003</td>
<td>0.003</td>
<td>0.003</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.002</td>
<td>0.002</td>
<td>Manganese</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>0.718</td>
<td>0.144</td>
<td>0.035</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Sourcewide PTE Total</strong></td>
<td><strong>3.89</strong></td>
<td><strong>3.36</strong></td>
<td><strong>3.25</strong></td>
<td><strong>0.005</strong></td>
<td><strong>0.77</strong></td>
<td><strong>48.03</strong></td>
<td><strong>0.65</strong></td>
<td><strong>3.24</strong></td>
<td><strong>0.74</strong></td>
<td>Isocyanates</td>
</tr>
</tbody>
</table>

* The baghouses controlling emissions for the woodworking operation are integral to the process. Therefore only the potential emissions after controls are considered when determining the permit level except for PVC cutting.
### Appendix A: Emissions Calculations

**VOC and Particulate**

**From Surface Coating Operations**

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M097-41936-00062  
**Permit Reviewer:** Daria Antipova

#### Chassis Frame and Floor Preparation Area

| Material Description | Density (Lb/Gal) | Weight % Volatiles (VOC & Organics) | Weight % Water | Weight % Organics | Volume % Water | Gal of Mat. (gal/unit) | Maximum (units/hour) | Maximum (gal/day) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | Transfer Efficiency | Substrate | Application Method |
|----------------------|-----------------|------------------------------------|----------------|-------------------|----------------|----------------------|----------------------|------------------|-------------------------------------|-----------------------------|-----------------------------|-------------------------------|-------------------------------|-----------------------------|-----------------|---------------------|
| Touch N Tone Flat Black | 5.98 | 79.05% | 40.00% | 39.05% | 38.19% | 3.000 | 1.386 | 2.16 | 0.12 | 2.95 | 0.54 | 0.18 | 0% | plastic, metal | aerosol |
| Polyurethane Adhesive ISO Fast Cure | 10.01 | 4.58% | 0.00% | 4.58% | 0.00% | 0.010 | 3.000 | 0.720 | 4.80 | 4.08 | 0.12 | 2.94 | 0.54 | 0.00 | 100% | plastic | dip ball |
| Weld-On 773 ABS Plastic Pipe Cement | 7.42 | 70.00% | 15.00% | 55.00% | 15.00% | 0.010 | 3.000 | 0.720 | 4.80 | 4.08 | 0.12 | 2.94 | 0.54 | 0.00 | 100% | plastic | dip ball |

**Clean Up Solvents**

| Material Description | Density (Lb/Gal) | Weight % Volatiles (VOC & Organics) | Weight % Water | Weight % Organics | Volume % Water | Gal of Mat. (gal/unit) | Maximum (units/hour) | Maximum (gal/day) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | Transfer Efficiency | Substrate | Application Method |
|----------------------|-----------------|------------------------------------|----------------|-------------------|----------------|----------------------|----------------------|------------------|-------------------------------------|-----------------------------|-----------------------------|-------------------------------|-------------------------------|-----------------------------|-----------------|---------------------|
| Isopropyl Alcohol | 6.55 | 100.00% | 0.00% | 100.00% | 0.00% | 0.010 | 3.000 | 0.720 | 6.55 | 6.55 | 0.20 | 4.72 | 0.86 | 0.00 | 100% | plastic | spray bottle |

<table>
<thead>
<tr>
<th>Total Potential to Emit</th>
<th>0.46</th>
<th>10.93</th>
<th>2.00</th>
<th>0.18</th>
</tr>
</thead>
</table>

**Total Surface Coating Not-Exempt Under 326 IAC 6-3-(1b)(5)-(8),(12),(15)**

<table>
<thead>
<tr>
<th>Total</th>
<th>3.528</th>
</tr>
</thead>
</table>

**Notes:**
Surface coating means the application of a solvent or waterbased coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.
Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
From Surface Coating Operations

Company Name: Keystone Recreational Vehicle Company Plant 820
Source Address: 0965 N 1150 W, Middlebury, IN 46540
Permit Number: M087-41939-00062
Permit Reviewer: Daria Antipova

Chassis Frame and Floor Preparation Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Isocyanates</th>
<th>Xylene (ton/yr)</th>
<th>Ethylbenzene (ton/yr)</th>
<th>Isocyanates (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Touch N Tone Flat Black</td>
<td>5.98</td>
<td>0.0190</td>
<td>3.0000</td>
<td>2.50%</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.04</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Polyurethane Adhesive 550 Fast Cure</td>
<td>10.01</td>
<td>0.0100</td>
<td>3.0000</td>
<td>6.00%</td>
<td>2.00%</td>
<td>0.20%</td>
<td>0.08</td>
<td>0.03</td>
<td>0.003</td>
</tr>
<tr>
<td>Weld-On 773 ABS Plastic Pipe Cement</td>
<td>7.42</td>
<td>0.0100</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Isopropyl Alcohol</td>
<td>6.55</td>
<td>0.0100</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total Potential Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Xylene (ton/yr)</th>
<th>Ethylbenzene (ton/yr)</th>
<th>Isocyanates (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>0.12</td>
<td>0.04</td>
<td>0.003</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Keystone Recreational Vehicle Company Plant 820
Source Address: 0965 N 1150 W, Middlebury, IN 46540
Permit Number: M087-41936-00062
Permit Reviewer: Daria Antipova

Cabinet and Mill Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
<th>Application Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multibond Adhesive</td>
<td>9.09</td>
<td>49.50%</td>
<td>48.90%</td>
<td>92.86%</td>
<td>0.4000</td>
<td>3.000</td>
<td>0.19</td>
<td>0.09</td>
<td>0.11</td>
<td>2.62</td>
<td>0.48</td>
<td>0.00</td>
<td>100% wood flow</td>
<td>Metal</td>
<td>Other</td>
<td></td>
</tr>
</tbody>
</table>

Total Potential to Emit: 0.11 2.62 0.48 0.00

Total Surface Coating Not-Exempt Under 326 IAC 6-3-1(b)(5)-(8),(12),(15): 0.000 Metal 0.00 Other 0.48

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (Lb/Gal) * Weight % Organics) / (1-Volume % water)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon Coating (Lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (Lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (Lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (Lb/gal) * Weight % Organics) / (Volume % solids)

Notes:
The water is used as a clean up solvent for a wood (it is a hand wiping part of operation).
Surface coating means the application of a solvent or water-based coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.
The materials used do not contain hazardous air pollutants.
## Appendix A: Emissions Calculations

### VOC and Particulate From Surface Coating Operations

#### Company Name:
Keystone Recreational Vehicle Company Plant 820

#### Source Address:
0965 N 1150 W, Middlebury, IN 46540

#### Permit Number:
M097-41939-00062

#### Permit Reviewer:
Daria Antipova

---

### Unit Assembly Area Surface Coating

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatiles (VOC &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Gal of Mat. (gallon/unit)</th>
<th>Maximum (gallon/unit)</th>
<th>Maximum (gallon/day)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential Tons per Year</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
<th>Application Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rectorseal Special</td>
<td>11.68</td>
<td>16.00%</td>
<td>0.00%</td>
<td>16.00%</td>
<td>0.00%</td>
<td>0.0300</td>
<td>3.000</td>
<td>2.160</td>
<td>1.87</td>
<td>1.87</td>
<td>0.17</td>
<td>4.04</td>
<td>0.74</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>dip ball</td>
</tr>
<tr>
<td>Apollo Adhesive 2029</td>
<td>8.84</td>
<td>2.00%</td>
<td>0.00%</td>
<td>2.00%</td>
<td>0.00%</td>
<td>0.0200</td>
<td>3.000</td>
<td>1.440</td>
<td>1.18</td>
<td>1.18</td>
<td>0.01</td>
<td>0.35</td>
<td>0.06</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>by hand</td>
</tr>
<tr>
<td>Polysulfane Adhesive 590 Fast Cure</td>
<td>10.51</td>
<td>4.58%</td>
<td>0.00%</td>
<td>4.58%</td>
<td>0.00%</td>
<td>0.0200</td>
<td>3.000</td>
<td>1.440</td>
<td>1.44</td>
<td>1.44</td>
<td>0.03</td>
<td>0.46</td>
<td>0.06</td>
<td>0.17</td>
<td>100%</td>
<td>plastic, metal</td>
<td>caulk</td>
</tr>
<tr>
<td>Stig 65 Non-Alkylated Sealant</td>
<td>8.00</td>
<td>0.50%</td>
<td>0.00%</td>
<td>0.50%</td>
<td>0.00%</td>
<td>0.0100</td>
<td>3.000</td>
<td>0.120</td>
<td>0.02</td>
<td>0.02</td>
<td>0.01</td>
<td>0.22</td>
<td>0.04</td>
<td>0.00</td>
<td>100%</td>
<td>wood</td>
<td>blow coat</td>
</tr>
<tr>
<td>Adhesive Promoter 4060LV</td>
<td>8.80</td>
<td>0.20%</td>
<td>0.00%</td>
<td>0.20%</td>
<td>0.00%</td>
<td>0.0100</td>
<td>3.000</td>
<td>0.120</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.22</td>
<td>0.04</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>by hand</td>
</tr>
<tr>
<td>Adhesive 1070 Roof Adhesive</td>
<td>8.51</td>
<td>32.00%</td>
<td>1.00%</td>
<td>31.04%</td>
<td>0.00%</td>
<td>0.0500</td>
<td>3.000</td>
<td>36.000</td>
<td>0.12</td>
<td>0.12</td>
<td>0.09</td>
<td>0.13</td>
<td>0.56</td>
<td>0.00</td>
<td>100%</td>
<td>rubber, metal</td>
<td>roller</td>
</tr>
<tr>
<td>Premier P6999 Non-Alkylated Adhesive</td>
<td>8.00</td>
<td>78.84%</td>
<td>5.17%</td>
<td>73.67%</td>
<td>4.00%</td>
<td>0.1500</td>
<td>3.000</td>
<td>10.800</td>
<td>4.78</td>
<td>4.78</td>
<td>2.07</td>
<td>49.37</td>
<td>9.56</td>
<td>0.00</td>
<td>100%</td>
<td>wood</td>
<td>flow coat</td>
</tr>
<tr>
<td>lap Sealant 1010</td>
<td>11.92</td>
<td>18.00%</td>
<td>0.00%</td>
<td>18.00%</td>
<td>0.00%</td>
<td>0.0000</td>
<td>3.000</td>
<td>6.480</td>
<td>2.15</td>
<td>2.15</td>
<td>0.58</td>
<td>13.00</td>
<td>2.64</td>
<td>0.00</td>
<td>100%</td>
<td>rubber, metal</td>
<td>caulk</td>
</tr>
<tr>
<td>UV-9 Wicking Compound</td>
<td>8.87</td>
<td>48.00%</td>
<td>3.00%</td>
<td>45.00%</td>
<td>2.00%</td>
<td>0.3000</td>
<td>3.000</td>
<td>8.400</td>
<td>2.46</td>
<td>2.46</td>
<td>0.64</td>
<td>44.27</td>
<td>8.08</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>caulk</td>
</tr>
<tr>
<td>Self-Leveling Sealant 1021</td>
<td>11.18</td>
<td>32.00%</td>
<td>22.00%</td>
<td>30.00%</td>
<td>4.00%</td>
<td>0.2500</td>
<td>3.000</td>
<td>18.000</td>
<td>2.46</td>
<td>2.46</td>
<td>1.84</td>
<td>44.27</td>
<td>8.08</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>caulk</td>
</tr>
<tr>
<td>High Heat Adhesive 48 Plastic Pipe Cement</td>
<td>7.82</td>
<td>70.00%</td>
<td>15.00%</td>
<td>55.00%</td>
<td>35.00%</td>
<td>0.0500</td>
<td>3.000</td>
<td>6.450</td>
<td>4.80</td>
<td>4.80</td>
<td>1.10</td>
<td>28.44</td>
<td>5.63</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>dip ball</td>
</tr>
<tr>
<td>Henpon 845 Clear Sealant</td>
<td>8.51</td>
<td>2.00%</td>
<td>0.00%</td>
<td>2.00%</td>
<td>0.00%</td>
<td>0.7500</td>
<td>3.000</td>
<td>54.000</td>
<td>0.25</td>
<td>0.25</td>
<td>0.56</td>
<td>13.32</td>
<td>2.43</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal</td>
<td>caulk</td>
</tr>
</tbody>
</table>

| Clean Up Solvents            |                  |                                    |                |                  |                |                          |                        |                   |                             |                                 |                            |                            |                          |                            |                            |                        |                        |                        |
| Isopropyl Alcohol            | 8.65             | 100.00%                            | 0.00%          | 100.00%          | 0.00%          | 0.0500                    | 3.000                 | 6.55               | 6.55                        | 6.55                             | 0.98                        | 23.68                       | 4.60                      | 0.00                        | 100%                    | plastic, metal            | spray bottle       |

---

### Total Emissions

| Total Surface Coating Not-Exempt Under 326 IAC 6-3-1(b)(5)-(8),(12),(15) | 150.480 |
| Total Potential to Emit | 7.76       | 150.480 |
| Methodeology            | 33.99      | 150.480 |
| Metal                   | 6.38       | 150.480 |
| Other                   | 27.60      | 150.480 |

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### Notes
- Surface coating means the application of a solvent or waterbased coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.

---

### METHODOLOGY

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- **Pounds of VOC per Gallon Coating** = (Density (lb/gal) * Weight % Organics)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gallon/unit) * Maximum (units/hr)
- **Potential VOC Pounds per Day** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gallon/unit) * Maximum (units/hr) * 24 (hr/day)
- **Potential VOC Tons per Year** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gallon/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
- **Particulate Potential Tons per Year** = (units/hour) * (gallon/unit) * (lb/gallon) * [1-Transfer efficiency] * (17670 hrs/yr) * (1 ton/2000 lbs)
- **Pounds VOC per Gallon of Solids** = (Density (lb/gal)) * (Weight % organics) / (Volume % solids)

---

### Notes
- The above formulas are used to calculate the potential emissions and particulate potential for each material. The calculations take into account the density, weight percentage of volatile and organic compounds, and the transfer efficiency of the application method.
## Emissions Calculations

### Hazardous Air Pollutants (HAPs)

#### From Surface Coating Operations

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

### Unit Assembly Area Surface Coating

| Material                          | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % Ethylbenzene | Weight % Glycol Ethers | Weight % Isocyanates | Weight % Vinyl Acetate | Weight % Methanol | Xylene (ton/yr) | Toluene (ton/yr) | Ethylbenzene (ton/yr) | Glycol Ethers (ton/yr) | Isocyanates (ton/yr) | Vinyl Acetate (ton/yr) | Methanol (ton/yr) |
|-----------------------------------|------------------|-------------------------------|---------------------|-----------------|-----------------|-----------------------|------------------------|---------------------|----------------------|-----------------|----------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Rectorseal Special                | 11.68            | 0.0300                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 16.00%                 | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.74                 | 0.00                   | 0.00                   |
| Apollo Adhesive 2028              | 8.84             | 0.0200                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Polyurethane Adhesive 550 Fast Cure| 10.01            | 0.0200                        | 3.0000              | 0.00%           | 2.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.16           | 0.00               | 0.00                 | 0.05                 | 0.00                 | 0.006                 | 0.00                   |
| Stig 55 Non-Atomized Bead Glue    | 6.00             | 0.0100                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.24                 | 0.00                   | 0.00                   |
| Adhesive Promoter 4298UV          | 6.80             | 0.0100                        | 3.0000              | 35.00%          | 0.00%           | 11.00%                | 0.00%                  | 0.00%               | 0.00%                | 0.40%           | 0.31           | 0.003              | 0.10                 | 0.00                 | 0.00                 | 0.004                 | 0.00                   |
| Alpha 8010 Roof Adhesive         | 8.51             | 0.5000                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.40%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.22                   | 0.00                   |
| Premier PB999 Non-Atomized Adhesive| 5.00             | 0.1500                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Lap Sealant 1010                  | 11.92            | 0.0900                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Anti Wicking Compound             | 8.67             | 0.1200                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Self Leveling Sealant 1021        | 11.18            | 0.2500                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Weld-On 773 ABS Plastic Pipe Cement| 7.42             | 0.0900                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Trempro 645 Clear Sealant         | 8.51             | 0.7500                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |
| Clean Up Solvents                 |                  |                               |                     |                 |                 |                       |                       |                    |                     |                 |               |                   |                     |                     |                     |                       |                       |
| Isopropyl Alcohol                 | 6.55             | 0.0500                        | 3.0000              | 0.00%           | 0.00%           | 0.00%                 | 0.00%                  | 0.00%               | 0.00%                | 0.00%           | 0.00           | 0.00               | 0.00                 | 0.00                 | 0.00                 | 0.00                   | 0.00                   |

**Total Potential Emissions**

<table>
<thead>
<tr>
<th>Xylene</th>
<th>Toluene</th>
<th>Ethylbenzene</th>
<th>Glycol Ethers</th>
<th>Isocyanates</th>
<th>Vinyl Acetate</th>
<th>Methanol</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.47</td>
<td>0.003</td>
<td>0.15</td>
<td>0.00</td>
<td>0.246</td>
<td>0.22</td>
<td>0.004</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gallons of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

#### VOC and Particulate

From Surface Coating Operations

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
** Permit Number:** M037-41939-00092  
**Permit Reviewer:** Daria Antipova

#### Slide-out Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatiles (VOC &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
<th>Application Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurethane Adhesive S60 Fast Cure</td>
<td>8.31</td>
<td>2.60%</td>
<td>0.00%</td>
<td>2.60%</td>
<td>0.00%</td>
<td>2.50</td>
<td>3.000</td>
<td>2.100</td>
<td>2.36</td>
<td>0.25</td>
<td>0.25</td>
<td>0.02</td>
<td>0.53</td>
<td>0.10</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal, caulk</td>
</tr>
<tr>
<td>Self Leveling Sealer 1121</td>
<td>11.18</td>
<td>22.00%</td>
<td>0.00%</td>
<td>22.00%</td>
<td>0.00%</td>
<td>0.0380</td>
<td>3.000</td>
<td>2.100</td>
<td>2.46</td>
<td>0.22</td>
<td>0.22</td>
<td>0.00</td>
<td>0.71</td>
<td>0.14</td>
<td>0.00</td>
<td>100%</td>
<td>rubber, metal, caulk</td>
</tr>
<tr>
<td>Trempro 645 Clear Sealant</td>
<td>8.51</td>
<td>2.90%</td>
<td>0.00%</td>
<td>2.90%</td>
<td>0.00%</td>
<td>0.0300</td>
<td>3.000</td>
<td>2.100</td>
<td>0.25</td>
<td>0.25</td>
<td>0.02</td>
<td>0.00</td>
<td>0.71</td>
<td>0.14</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal, caulk</td>
</tr>
<tr>
<td>Isopropyl Alcohol</td>
<td>6.55</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.0000</td>
<td>3.000</td>
<td>0.380</td>
<td>0.65</td>
<td>0.10</td>
<td>2.36</td>
<td>0.43</td>
<td>0.00</td>
<td>100%</td>
<td>plastic, metal, spray bottle</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Clean Up Solvents

**Total Potential to Emit** 0.37 8.86 1.62 0.00

**Total** 0.000  
**Metal** 1.62  
**Other** 0.00  

#### METHODOLOGY

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

#### Notes:

Surface coating means the application of a solvent or water-based coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.
### Appendix A: Emissions Calculations
#### Hazardous Air Pollutants (HAPs)
#### From Surface Coating Operations

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

#### Slide-out Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Isocyanates</th>
<th>Xylene (ton/yr)</th>
<th>Ethylbenzene (ton/yr)</th>
<th>Isocyanates (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurethane Adhesive 550 Fast Cure</td>
<td>10.01</td>
<td>0.0200</td>
<td>3.0000</td>
<td>6.00%</td>
<td>2.00%</td>
<td>0.20%</td>
<td>0.16</td>
<td>0.05</td>
<td>0.01</td>
</tr>
<tr>
<td>Self Leveling Sealant 1021</td>
<td>11.18</td>
<td>0.0300</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Trempro 645 Clear Sealant</td>
<td>8.51</td>
<td>0.0300</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

#### Clean Up Solvents

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Isocyanates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl Alcohol</td>
<td>6.55</td>
<td>0.0050</td>
<td>3.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

#### Total Potential Emissions

<table>
<thead>
<tr>
<th>Xylene (ton/yr)</th>
<th>Ethylbenzene (ton/yr)</th>
<th>Isocyanates (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.16</td>
<td>0.05</td>
<td>0.01</td>
</tr>
</tbody>
</table>

**Total HAPs 0.22**

### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
## Appendix A: Emissions Calculations
### VOC and Particulate From Surface Coating Operations

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

### Final Finish and Repair Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (linGal)</th>
<th>Weight % Volatile (VOC &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Touch N Tone Flat Black</td>
<td>9.95</td>
<td>76.05%</td>
<td>40.98%</td>
<td>31.05%</td>
<td>28.19%</td>
<td>0.00</td>
<td>3.00</td>
<td>5.18</td>
<td>3.38</td>
<td>2.16</td>
<td>0.19</td>
<td>4.68</td>
</tr>
<tr>
<td>Polyurethane Adhesive 550 Fast Cure</td>
<td>10.91</td>
<td>4.88%</td>
<td>0.00%</td>
<td>4.88%</td>
<td>0.00%</td>
<td>0.00</td>
<td>3.00</td>
<td>1.91</td>
<td>0.96</td>
<td>0.64</td>
<td>0.03</td>
<td>0.96</td>
</tr>
<tr>
<td>Stix 55 Non-Atomized Bead Glue</td>
<td>8.90</td>
<td>5.00%</td>
<td>0.00%</td>
<td>5.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>3.00</td>
<td>3.16</td>
<td>0.30</td>
<td>0.30</td>
<td>0.03</td>
<td>0.65</td>
</tr>
<tr>
<td>Trempro 645 Clear Sealant</td>
<td>8.11</td>
<td>2.50%</td>
<td>0.00%</td>
<td>2.90%</td>
<td>0.00%</td>
<td>0.00</td>
<td>3.00</td>
<td>3.60</td>
<td>0.25</td>
<td>0.25</td>
<td>0.04</td>
<td>0.99</td>
</tr>
</tbody>
</table>

### Clean Up Solvents

<table>
<thead>
<tr>
<th>Solvent</th>
<th>Density (linGal)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl Alcohol</td>
<td>6.95</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>3.00</td>
<td>6.55</td>
<td>6.55</td>
<td>4.72</td>
<td>9.86</td>
</tr>
<tr>
<td>Mineral Spirits</td>
<td>8.69</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>3.00</td>
<td>8.48</td>
<td>8.48</td>
<td>6.78</td>
<td>13.56</td>
</tr>
</tbody>
</table>

### METHODOLOGY

<table>
<thead>
<tr>
<th>Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)</td>
</tr>
<tr>
<td>Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gall/unit) * Maximum (units/hr)</td>
</tr>
<tr>
<td>Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gall/unit) * Maximum (units/hr) * (24 hr/day)</td>
</tr>
<tr>
<td>Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gall/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)</td>
</tr>
<tr>
<td>Particulate Potential Tons per Year = (units/hour) * (gall/unit) * (lb/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)</td>
</tr>
<tr>
<td>Pounds VOC per Gallon of Solids = (Density (lb/gal) * Weight % organics) / (Volume % solids)</td>
</tr>
</tbody>
</table>

### Notes:

Surface coating means the application of a solvent or waterbased coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.
Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
From Surface Coating Operations

Company Name: Keystone Recreational Vehicle Company Plant 820
Source Address: 0965 N 1150 W, Middlebury, IN 46540
Permit Number: M087-41939-00062
Permit Reviewer: Daria Antipova

#### Final Finish and Repair Area

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Isocyanates</th>
<th>Xylene (ton/yr)</th>
<th>Ethylbenzene (ton/yr)</th>
<th>Isocyanates (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Final Finish and Repair Surface Coating</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Touch N Tone Flat Black</td>
<td>5.98</td>
<td>0.0300</td>
<td>3.0000</td>
<td>2.50%</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.06</td>
<td>0.02</td>
<td>0.00</td>
</tr>
<tr>
<td>Polyurethane Adhesive 550 Fast Cure</td>
<td>10.01</td>
<td>0.0200</td>
<td>3.0000</td>
<td>6.00%</td>
<td>2.00%</td>
<td>0.20%</td>
<td>0.16</td>
<td>0.05</td>
<td>0.006</td>
</tr>
<tr>
<td>Stiq 55 Non-Atomized Bead Glue</td>
<td>6.00</td>
<td>0.0300</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>30.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.71</td>
</tr>
<tr>
<td>Trempro 645 Clear Sealant</td>
<td>8.51</td>
<td>0.0500</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Clean Up Solvents</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isopropyl Alcohol</td>
<td>6.55</td>
<td>0.0100</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Mineral Spirits</td>
<td>6.59</td>
<td>0.0900</td>
<td>3.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total Potential Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.22</td>
<td>0.07</td>
<td>0.72</td>
</tr>
</tbody>
</table>

**Total HAPs** 1.01

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

<table>
<thead>
<tr>
<th>Unit ID (s)</th>
<th>Baghouse 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/PM10/PM2.5 Emissions before Controls (grains/hr)</th>
<th>PM/PM10/PM2.5 Emission Rate before Controls (lb/hr)</th>
<th>PM/PM10/PM2.5 Emission Rate after Controls (lb/hr)</th>
<th>PM/PM10/PM2.5 Emission Rate after Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chassis Frame and Floor Preparation Area/Cabinet and Mill Area</td>
<td>DC</td>
<td>99.98%</td>
<td>0.00174</td>
<td>10,000</td>
<td>1044</td>
<td>746</td>
<td>3,266</td>
<td>0.149</td>
</tr>
<tr>
<td>Assembly and Final Finish Areas</td>
<td>PB1</td>
<td>99.00%</td>
<td>0.00048</td>
<td>1,120</td>
<td>32</td>
<td>0.461</td>
<td>2.02</td>
<td>0.005</td>
</tr>
<tr>
<td>PVC Cutting Chop Saw</td>
<td>PB2</td>
<td>99.00%</td>
<td>0.00048</td>
<td>1,120</td>
<td>32</td>
<td>0.46</td>
<td>2.02</td>
<td>0.005</td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Methodology

- **Emission Rate in lbs/hr (after controls)** = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
- **Emission Rate in tons/yr** = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
- **Emission Rate in lbs/hr (before controls)** = Emission Rate (after controls)/(1-control efficiency)
- **Emission Rate in tons/yr** = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
- **PM/PM10/PM2.5 Emissions (grains/hr)** = Grain Loading (gr/acf) * Air Flow (acfm) * 60 (min/hr)
- **PM/PM10/PM2.5 Emissions (lbs/hr)** = PM/PM10/PM2.5 Emissions (grains/hr) * (1 lb/7000 grains)
- **PM/PM10/PM2.5 Emissions (tons/yr)** = PM/PM10/PM2.5 Emissions (lbs/hr) * 8760 hrs/yr * 2000 lbs/ton

* The baghouse controlling emissions for the woodworking operation are integral to the process. Therefore only the potential emissions after controls are considered when determining the permit level except PVC cutting.
Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>1.80</td>
<td>1020</td>
<td>15.5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.01</td>
<td>0.06</td>
<td>0.06</td>
<td>0.005</td>
<td>0.77</td>
<td>0.04</td>
<td>0.65</td>
</tr>
</tbody>
</table>

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

**Methodology**

All emission factors are based on normal firing.  

MMBtu = 1,000,000 Btu  

MMCF = 1,000,000 Cubic Feet of Gas  

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

**[HAPs - Organics]**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</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>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.6E-05</td>
<td>9.3E-06</td>
<td>5.8E-04</td>
<td>0.01</td>
<td>2.6E-05</td>
<td></td>
</tr>
</tbody>
</table>

**[HAPs - Metals]**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</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 tons/yr</td>
<td>3.9E-06</td>
<td>8.5E-06</td>
<td>1.1E-05</td>
<td>2.9E-06</td>
<td>1.6E-05</td>
<td>4.2E-05</td>
</tr>
</tbody>
</table>

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

**Welding Operations**

**Company Name:** Keystone Recreational Vehicle Company Plant 820  
**Source Address:** 0965 N 1150 W, Middlebury, IN 46540  
**Permit Number:** M087-41939-00062  
**Permit Reviewer:** Daria Antipova

<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>PM = PM10 Mn Ni Cr PM = PM10 Mn Ni Cr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GMAW - E70S</td>
<td>1</td>
<td>0.12</td>
<td>0.0052 0.00318 0.00001 0.00001 0.001 3.82E-04 1.20E-06 1.20E-06 0.000</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total electrode consumption (lbs/day):** 2.88

**EMISSION TOTALS**

<table>
<thead>
<tr>
<th></th>
<th>Potential Emissions lbs/hr</th>
<th>Potential Emissions lbs/day</th>
<th>Potential Emissions tons/year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.001 3.62E-04 1.20E-06 1.20E-06 3.84E-04</td>
<td>0.01 0.01 2.88E-05 2.88E-05 0.01</td>
<td>0.003 0.002 5.26E-06 5.26E-06 0.002</td>
</tr>
</tbody>
</table>

**Methodology:**

*Emission factors from AP-42 Chapter 12.19 (Electric Arc Welding), Table 12.19-2  
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
Emissions, lbs/day = emissions, lb/hr x 24 hrs/day  
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: Keystone Recreational Vehicle Company Plant 820
Source Address: 0965 N 1150 W, Middlebury, IN 46540
Permit Number: M087-41939-00062
Reviewer: Daria Antipova

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (ton/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi Tractor - Delivery (entering plant) (one-way trip)</td>
<td>4.0</td>
<td>1.0</td>
<td>4.0</td>
<td>40.0</td>
<td>160.0</td>
<td>500</td>
<td>0.095</td>
<td>0.4</td>
<td>138.3</td>
</tr>
<tr>
<td>Semi Tractor - Delivery (leaving plant) (one-way trip)</td>
<td>4.0</td>
<td>1.0</td>
<td>4.0</td>
<td>40.0</td>
<td>160.0</td>
<td>500</td>
<td>0.095</td>
<td>0.4</td>
<td>138.3</td>
</tr>
<tr>
<td>Travel Trailer Chassis - Delivery (entering plant) (one-way trip)</td>
<td>24.0</td>
<td>1.0</td>
<td>24.0</td>
<td>2.5</td>
<td>60.0</td>
<td>500</td>
<td>0.095</td>
<td>2.3</td>
<td>829.5</td>
</tr>
<tr>
<td>Completed Travel Trailers - Delivery (leaving plant) (one-way trip)</td>
<td>24.0</td>
<td>1.0</td>
<td>24.0</td>
<td>5.0</td>
<td>120.0</td>
<td>500</td>
<td>0.095</td>
<td>2.3</td>
<td>829.5</td>
</tr>
</tbody>
</table>

|        | Totals | 56.0 | 500.0 | 5.3 | 1935.6 |

Average Vehicle Weight Per Trip = 8.9 tons/trip
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor, Ef = \[k \cdot (sL)^{0.91} \cdot (W)^{1.02}\]  
where:
- \(k = 0.011\) 0.0022 0.00054 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
- \(W = 8.9\) 8.9 8.9 tons = average vehicle weight
- \(sL = 9.7\) 9.7 9.7 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext = 0.742 0.148 0.0364 lb/mile

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM (After Control) (ton/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (ton/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi Tractor - Delivery (entering plant) (one-way trip)</td>
<td>0.05</td>
<td>0.01</td>
<td>0.01</td>
<td>0.05</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Semi Tractor - Delivery (leaving plant) (one-way trip)</td>
<td>0.05</td>
<td>0.01</td>
<td>0.01</td>
<td>0.05</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Travel Trailer Chassis - Delivery (entering plant) (one-way trip)</td>
<td>0.31</td>
<td>0.06</td>
<td>0.02</td>
<td>0.31</td>
<td>0.06</td>
<td>0.02</td>
</tr>
<tr>
<td>Completed Travel Trailers - Delivery (leaving plant) (one-way trip)</td>
<td>0.31</td>
<td>0.06</td>
<td>0.02</td>
<td>0.31</td>
<td>0.06</td>
<td>0.02</td>
</tr>
<tr>
<td>Totals</td>
<td>0.72</td>
<td>0.14</td>
<td>0.04</td>
<td>0.72</td>
<td>0.14</td>
<td>0.04</td>
</tr>
</tbody>
</table>

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] \* [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / 5280 ft/mile
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way distance (mi/trip)] / SUM[Maximum trips per day (trip/day)]

Unmitigated PTE (ton/yr) = [Maximum one-way miles (miles/day)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
Mitigated PTE (After Control) (ton/yr) = [Mitigated PTE (Before Control) (ton/yr)] \* (1 - Dust Control Efficiency)

Abbreviations

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

* = [Maximum one-way miles (miles/day)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
November 8, 2019

Mr. J. Christopher Ulmer  
Keystone Recreational Vehicle Co., Plant 820  
PO Box 2000  
Goshen, IN 46527-2000

Re: Public Notice  
Keystone Recreational Vehicle Co., Plant 820  
Permit Level: MSOP  
Permit Number: 087-41939-00062

Dear Mr. Ulmer:

Enclosed is a copy of your draft, MSOP, 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](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 Middlebury Public Library, 101 E. Winslow Street in Middlebury, IN 46540. 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 Daria Antipova, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-3429 or dial (317) 234-3429.

Sincerely,

Vicki Biddle

Vicki Biddle  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 4/12/19
November 8, 2019

To: Middlebury 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: Keystone Recreational Vehicle Co., Plant 820
Permit Number: 087-41939-00062

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.
Notice of Public Comment

November 8, 2019
Keystone Recreational Vehicle Co., Plant 820
087-41939-00062

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.
**Mail Code 61-53**

<table>
<thead>
<tr>
<th>Name and address of Sender</th>
<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line</td>
<td>Article Number</td>
<td>Name, Address, Street and Post Office Address</td>
</tr>
<tr>
<td>1</td>
<td>1</td>
<td>J Christopher Ulmer  Keystone Recreational Vehicle Company Plant 820 PO Box 2000 Goshen IN 465272000 (Source CAATS)</td>
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<tr>
<td>2</td>
<td>2</td>
<td>David Thomas  Keystone Recreational Vehicle Company Plant 820 PO Box 2000 Goshen IN 465272000 (RO CAATS)</td>
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<td>3</td>
<td>3</td>
<td>Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)</td>
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<td>4</td>
<td>4</td>
<td>Middlebury Public Library 101 East Winslow, P.O. Box 192 Middlebury IN 46540-0192 (Library)</td>
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<td>5</td>
<td>5</td>
<td>LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)</td>
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<td>6</td>
<td>6</td>
<td>President of Town Council 345 N Morton St Shipshewana IN 46565 (Local Official)</td>
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<td>7</td>
<td>LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)</td>
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<td>8</td>
<td>8</td>
<td>Mr. Kevin Parks D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
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<td>9</td>
<td>9</td>
<td>Dustin &amp; Muranda Hall 401 N Townline Road LaGrange IN 46761 (Affected Party)</td>
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<td>10</td>
<td>10</td>
<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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</table>

**Total number of pieces Listed by Sender**: 10

**Total number of Pieces Received at Post Office**: 10

**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.