



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Minor Source Operating Permit (MSOP)

for Forest River, Inc., Plant 79 in DeKalb County

MSOP No.: M033-43252-00120

The Indiana Department of Environmental Management (IDEM) has received an application from Forest River, Inc., Plant 79, located at 685 E. Main St., Butler, Indiana 46721, for a new source review and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Forest River, Inc., Plant 79 to make certain changes at its existing source and to continue to operate its existing source. Forest River, Inc., Plant 79 has applied for a transition from a Registration to a Minor Source Operating Permit. The source has also requested to construct one (1) assembly operation (EU2), one (1) woodworking operation (WW2), two (2) aluminum routers (AW3 & AW4), and three (3) space heaters (NG4 through NG6) that will be located in the new Building 2. The source has also requested to modify some of the existing units.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Butler Public Library
340 S. Broadway St.
Butler, IN 46721

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 application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access 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 M 033-43252-00120 in all correspondence.

Comments should be sent to:

Michaela Hecox
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031
Or dial directly: (317) 233-3031
Fax: (317) 232-6749 attn: Michaela Hecox
E-mail: MHecox@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 and will also be sent to the local library indicated above, IDEM Northern Regional Office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



Brian Williams, Section Chief
Permits Branch
Office of Air Quality



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Governor

Bruno L. Pigott
Commissioner

DRAFT

New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Forest River, Inc., Plant 79
685 E. Main St.
Butler, Indiana 46721**

(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.: M 033-43252-00120	
Master Agency Interest ID: 180	
Issued by:	Issuance Date:
Brian Willams, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	685 E. Main St., Butler, Indiana 46721
General Source Phone Number:	(574) 534-6913
SIC Code:	3792 (Travel Trailers and Campers)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Assembly Operation, identified as EU1, located in Bld 1, constructed in 2018 and approved for modification in 2020, with a maximum production rate of 1.0 vehicle per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.
- (b) One (1) Assembly Operation, identified as EU2, located in Bld 2, approved for construction in 2020, with a maximum production rate of 1.25 vehicles per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.
- (c) Woodworking operations consisting of the following:
 - (1) One (1) Woodworking operation, identified as WW1, located in Bld 1, constructed in 2018 and approved for modification in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.
 - (2) One (1) Woodworking operation, identified as WW2, located in Bld 2, approved for construction in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.
- (d) Aluminum Routers consisting of the following:
 - (1) Two (2) Aluminum Routers, identified as AW1 and AW2, located in Bld 1, constructed in 2018, cutting aluminum at a maximum rate of 0.4 vehicles per hour each, uncontrolled, and exhausting indoors.
 - (2) Two (2) Aluminum Routers, identified as AW3 and AW4, located in Bld 2,

approved for construction in 2020, cutting aluminum at a maximum rate of 0.4 vehicles per hour each, uncontrolled, and exhausting indoors.

- (e) Natural gas combustion units, consisting on the following emission units:
 - (1) One (1) space heater, identified as NG1, constructed in 2018, with a maximum heat input capacity of 0.4 MMBtu/hr, and exhausting to stack NGS1.
 - (2) One (1) space heater, identified as NG2, constructed in 2018, with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack NGS2.
 - (3) One (1) space heater, identified as NG3, constructed in 2018, with a maximum heat input capacity of 0.1 MMBtu/hr, and exhausting to stack NGS3.
 - (4) One (1) space heater, identified as NG4, approved for construction in 2020, with a maximum heat input capacity of 0.4 MMBtu/hr, and exhausting to stack NGS4.
 - (5) One (1) space heater, identified as NG5, approved for construction in 2020, with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack NGS5.
 - (6) One (1) space heater, identified as NG6, approved for construction in 2020, with a maximum heat input capacity of 0.1 MMBtu/hr, and exhausting to stack NGS6.
- (f) Paved Roads

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, M 033-43252-00120, 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 M 033-43252-00120 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

- (a) A record of all malfunctions, 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:

- (a) One (1) Assembly Operation, identified as EU1, located in Bld 1, constructed in 2018 and approved for modification in 2020, with a maximum production rate of 1.0 vehicle per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.
- (b) One (1) Assembly Operation, identified as EU2, located in Bld 2, approved for construction in 2020, with a maximum production rate of 1.25 vehicles per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.

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

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

D.1.1 Best Available Control Technology (BACT) Avoidance Limit [326 IAC 8-1-6]

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

- (1) The total VOC emissions from the one (1) assembly operation, identified as EU1, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.
- (2) The total VOC emissions from the one (1) assembly operation, identified as EU2, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each of the two (2) assembly operations (EU1 & EU2), and shall render the requirements of 326 IAC 8-1-6 not applicable to the two (2) assembly operations (EU1 & EU2).

D.1.2 Miscellaneous Metal and Plastic Parts Coating Operations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at the Assembly Operations, identified as EU1 and EU2, when applied to metal surfaces, shall be limited to 3.5 pounds of VOC per gallon of coating less water for air dried or forced warm air dried coatings.

D.1.3 Volatile Organic Compounds (VOC) Work Practices [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

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

depositing or removing these materials.

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

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

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

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

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

- (a) Compliance with the VOC content and usage limitations contained in Condition D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the VOC content limit in Condition D.1.2 shall be determined by the use of compliant coatings or pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis when non-compliant coatings are used. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

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

D.1.6 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) A log of the dates of use;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The VOC content of each coating less water as applied.
 - (3) The amount of coating material and solvent less water used on monthly basis and on a daily basis when using daily weighted averaging to show compliance with Condition D.1.2.
 - (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.
 - (4) The volume weighted average VOC content less water of the coatings used for each day when using daily weighted averaging to show compliance with Condition D.1.2.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.7 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Woodworking operations consisting of the following:
- (1) One (1) Woodworking operation, identified as WW1, located in Bld 1, constructed in 2018 and approved for modification in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.
 - (2) One (1) Woodworking operation, identified as WW2, located in Bld 2, approved for construction in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the each of the two (2) woodworking operations (WW1 & WW2) shall not exceed 15.1 pounds per hour when operating at a process weight rate of 14,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

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

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

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

D.2.3 Particulate Matter (PM)

In order to comply with Condition D.2.1, the integral dust collector shall be in operation and control emissions from the woodworking operations at all times the emission units are in operation.

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

D.2.4 Dust Collector Inspections

The Permittee shall perform semi-annual inspections of the integral dust collectors controlling particulate from the woodworking operations (WW1 & WW2) to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of the dates and results of the inspections.

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

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

Quarterly Report

Source Name: Forest River, Inc., Plant 79
Source Address: 685 E. Main St., Butler, Indiana 46721
MSOP Permit No.: M 033-43252-00120
Facility: The one (1) assembly operation (EU1)
Parameter: VOC Emissions
Limit: The total VOC emissions from the one (1) assembly operation, identified as EU1, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Quarterly Report

Source Name: Forest River, Inc., Plant 79
Source Address: 685 E. Main St., Butler, Indiana 46721
MSOP Permit No.: M 033-43252-00120
Facility: The one (1) assembly operation (EU2)
Parameter: VOC Emissions
Limit: The total VOC emissions from the one (1) assembly operation, identified as EU2, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Forest River, Inc., Plant 79
Source Address:	685 E. Main St.
City:	Butler, Indiana 46721
Phone #:	(574) 534-6913
MSOP #:	M 033-43252-00120

I hereby certify that Forest River, Inc., Plant 79 is:

still in operation.

no longer in operation.

I hereby certify that Forest River, Inc., Plant 79 is:

in compliance with the requirements of MSOP M 033-43252-00120.

not in compliance with the requirements of MSOP M 033-43252-00120.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

**Technical Support Document (TSD) for a Registration Transitioning to a
New Source Review and Minor Source Operating Permit (MSOP)**

Source Description and Location

Source Name:	Forest River, Inc., Plant 79
Source Location:	685 E. Main St., Butler, IN 46721
County:	DeKalb
SIC Code:	3792 (Travel Trailers and Campers)
Operation Permit No.:	M 033-43252-00120
Permit Reviewer:	Michaela Hecox

On September 8, 2020, the Office of Air Quality (OAQ) received an application from Forest River, Inc., Plant 79 related to the construction and operation of new emission units at an existing stationary travel trailer manufacturing operation and transition from a Registration to a MSOP.

Existing Approvals

The source has been operating under Registration No. 033-40219-00120, issued on September 12, 2018. There have been no subsequent approvals issued.

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

County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

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

- (c) Other Criteria Pollutants
DeKalb County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) 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.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Aluminum Routers consisting of the following:
- (1) Two (2) Aluminum Routers, identified as AW1 and AW2, located in Bld 1, constructed in 2018, cutting aluminum at a maximum rate of 0.4 vehicles per hour each, uncontrolled, and exhausting indoors.
- (b) Natural gas combustion units, consisting on the following emission units:
- (1) One (1) space heater, identified as NG1, constructed in 2018, with a maximum heat input capacity of 0.4 MMBtu/hr, and exhausting to stack NGS1.
 - (2) One (1) space heater, identified as NG2, constructed in 2018, with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack NGS2.
 - (3) One (1) space heater, identified as NG3, constructed in 2018, with a maximum heat input capacity of 0.1 MMBtu/hr, and exhausting to stack NGS3.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Forest River, Inc., Plant 79 on September 8, 2020, relating to the transition from a Registration to a Minor Source Operating Permit. The source has also requested to construct one (1) assembly operation (EU2), one (1) woodworking operation (WW2), two (2) aluminum routers (AW3 & AW4), and three (3) space heaters (NG4 through NG6) that will be located in the new Building 2. The source has also requested to modify some of the existing units.

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

- (a) One (1) Assembly Operation, identified as EU1, located in Bld 1, constructed in 2018 and approved for modification in 2020, with a maximum production rate of 1.0 vehicle per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.
- (b) One (1) Assembly Operation, identified as EU2, located in Bld 2, approved for construction in 2020, with a maximum production rate of 1.25 vehicles per hour, applying caulks, sealants, adhesives, touch-up paints, glues, cleanup solvents, and cleaners, uncontrolled, and exhausting indoors.
- (c) Woodworking operations consisting of the following:
 - (1) One (1) Woodworking operation, identified as WW1, located in Bld 1, constructed in 2018 and approved for modification in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.
 - (2) One (1) Woodworking operation, identified as WW2, located in Bld 2, approved for construction in 2020, processing pre-finished lumber at a maximum rate of 14,000 pounds per hour, equipped with one integral dust collector for particulate control, and exhausting indoors.
- (d) Aluminum Routers consisting of the following:
 - (1) Two (2) Aluminum Routers, identified as AW3 and AW4, located in Bld 2, approved for construction in 2020, cutting aluminum at a maximum rate of 0.4 vehicles per hour each, uncontrolled, and exhausting indoors.
- (e) Natural gas combustion units, consisting on the following emission units:
 - (1) One (1) space heater, identified as NG4, approved for construction in 2020, with a maximum heat input capacity of 0.4 MMBtu/hr, and exhausting to stack NGS4.
 - (2) One (1) space heater, identified as NG5, approved for construction in 2020, with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack NGS5.
 - (3) One (1) space heater, identified as NG6, approved for construction in 2020, with a maximum heat input capacity of 0.1 MMBtu/hr, and exhausting to stack NGS6.
- (f) Paved Roads

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to

produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

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.

	Unrestricted Source-Wide Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	11.76	5.66	5.66	3.61E-03	0.60	90.90	0.50	2.08	8.86
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Title V Major Source Thresholds	--	100	100	100	50	50	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	14.33	6.18	5.79	3.61E-03	0.60	90.90	0.50	2.08	8.86
MSOP Thresholds	25	25	25	25	25	25	100	10	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

³Single highest source-wide HAP.

*Fugitive HAP emissions are always included in the source-wide emissions.

Control for the woodworking operations is considered integral.

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 equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air 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 of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM, are not included in the Registration for the assembly operation because recreational vehicles do not meet the definition of *automobile* or *light-duty truck* under 40 CFR 60.391.
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14) are not included in the permit because the facility does not engage in the manufacture of wood furniture or wood furniture components and is not located at a plant site that is a major source of emissions of hazardous air pollutants (HAP), as defined in 40 CFR 63.800(a).
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85) are not included in the permit for the assembly operations, since this source is not a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP).
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80) are not included in the permit for the assembly operations because the source is neither a major source, nor located at a major source, nor part of a major source of emissions of HAP, as set forth in 40 CFR 63.3881(b).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81) are not included in the permit for the assembly operations because this source is not a major source of HAPs, as defined in 40 CFR 63.2. Emissions from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for total combined HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20-88) are not included in the permit, since the source does not conduct paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), and does not perform spray-applied coating operations of coatings that contain a target HAP to motor vehicles and mobile equipment, as defined in 40 CFR 63.11180.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX are not included in the permit, since this source is not primarily engaged in any one of the nine source categories listed in 40 CFR 63.11514(a) that use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), as defined in 40 CFR

63.11522.

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

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 2-4.1 (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)

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

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

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)

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

State Rule Applicability – Individual Facilities

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

Assembly Operations (EU1 & EU2)

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

- (a) Pursuant to 326 IAC 6-3-1(b)(5) through (8), surface coating operations using dip, roll, flow, or brush coating are exempt from this rule. The assembly operation (EU1) applies coatings using extrusion, roll coating, brushing or wiping application methods. These application methods do not cause particulate emissions. Pursuant to 326 IAC 6-3-1(b)(15), surface coating manufacturing processes, not otherwise exempt in 326 IAC 6-3-1(b)(5) through (8), which use less than five (5) gallons per day are exempt from this rule. The spray-applied coatings used in the assembly operation (EU1) are less than 5 gallons per day. Therefore, 326 IAC 6-3 does not apply.
- (b) Pursuant to 326 IAC 6-3-1(b)(5) through (8), surface coating operations using dip, roll, flow, or brush coating are exempt from this rule. The assembly operation (EU2) applies coatings using extrusion, roll coating, brushing or wiping application methods. These application methods do not cause particulate emissions.

Additionally, pursuant to 326 IAC 6-3-1.5(5) the assembly operation (EU2) is not subject to the requirements of 326 IAC 6-3, since the use of the cleaning material CD757 Heavy Duty Citrus Degreaser Aerosol does not meet the definition of *surface coating* as defined in 326 IAC 6-3-1.5(5).

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

The assembly operations (EU1 & EU2) were constructed after January 1, 1980, and each of their unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the assembly operations (EU1 & EU2) are not regulated by other rules in 326 IAC 8 when coating any other substrates besides metal. The source has opted to limit the potential to emit VOC from each of the assembly operations (EU1 & EU2) to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the assembly operations (EU1 & EU2) are not subject to the requirements of 326 IAC 8-1-6.

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

- (1) The total VOC emissions from the one (1) assembly operation, identified as EU1, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.
- (2) The total VOC emissions from the one (1) assembly operation, identified as EU2, shall not exceed twenty-four and nine-tenths (24.9) tons per twelve consecutive month period when coating any substrates other than metal, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each of the two (2) assembly operations (EU1 & EU2), and shall render the requirements of 326 IAC 8-1-6 not applicable to the two (2) assembly operations (EU1 & EU2).

326 IAC 8-2 (Surface Coating Emission Limitations)

Pursuant to IAC 326 8-2-1(a)(4), this rule applies to facilities which construction commenced after July 1, 1990, that are located in any county and that have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The assembly operations (EU1 & EU2) are subject to this rule because both emission units have potential VOC emissions greater than fifteen (15) pounds per day.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The assembly operations (EU1 & EU2) are not subject to this rule because this source does not conduct automobile and light duty truck surface coating operations.

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

(a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the assembly operations (EU1 & EU2) are subject to the requirements of 326 IAC 8-2-9, since they were constructed in 2018 and 2020, located in DeKalb County, and has the unlimited PTE of VOC equal to or greater than fifteen (15) pounds per day, and this source performs miscellaneous metal surface coating under the SIC group #37.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at each of the assembly operations (EU1 & EU2) shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

(b) These assembly operations (EU1 & EU2) are also subject to the work practices specified under 326 IAC 8-2-9(f).

(c) 326 IAC 8-1-2 (Compliance Methods)
 Pursuant to 326 IAC 8-1-2(a)(7), when using non-compliant coatings in each of the assembly operations (EU1 & EU2), the source shall demonstrate compliance with the applicable 326 IAC 8-2-9 VOC content limitation(s), using a daily volume-weighted average of all coatings applied on a daily basis in each of the assembly operations (EU1 & EU2).

Woodworking Operations (WW1 & WW2)

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the woodworking operations, since they are a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the woodworking operations shall not exceed 15.1 pounds per hour when operating at a process weight rate of 7.0 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Woodworking Operation (WW1 & WW2)	7.0	15.1	(a)

The integral dust collector for particulate control shall be in operation at all times both of the woodworking operations (WW1 & WW2) are in operation, in order to comply with this limit.

Aluminum Routers (AW1 through AW4)

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2. Therefore, each of the aluminum routers (AW1 through AW4) are not subject to the requirements of 326 IAC 6-3-2.

Natural Gas-Fired Combustion

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date (Removal Date)	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
NG1	2018	0.4	0.7	1.2	0.6	0.002
NG2	2018	0.2	0.7	1.2	0.6	0.002
NG3	2018	0.1	0.7	1.2	0.6	0.002
NG4	2020	0.4	1.4	0.99	0.6	0.002
NG5	2020	0.2	1.4	0.99	0.6	0.002
NG6	2020	0.1	1.4	0.99	0.6	0.002

Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed..

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

Liquid and gaseous fuels and combustion air are excluded from the definition of process weight as defined in 326 IAC 1-2-59(a). Therefore, the natural gas-fired combustion units are not subject to the requirements of 326 IAC 6-3-2.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

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

Even though, the natural gas-fired combustion units were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the source, 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 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the source, since the source does not operate a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

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

Testing Requirements:

There are no compliance testing requirements applicable to the two (2) assembly operations (EU1 & EU2). The source will demonstrate compliance with the VOC limits by keeping monthly records of their VOC emissions from the two (2) assembly operations (EU1 & EU2) to demonstrate compliance with the 326 IAC 8-1-6 avoidance limits.

Assembly Operations (EU1 & EU2)

Compliance with the 326 IAC 8-1-6 and 326 IAC 8-2-9 avoidance limits 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.

Compliance with the 326 IAC 8-2-9 VOC content limit shall be determined by the use of compliant coatings or pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis when non-complaint coatings are used. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

Woodworking Operations (WW1 & WW2)

The integral dust collector for particulate control shall be in operation at all times both of the woodworking operations (WW1 & WW2) are in operation, in order to comply with this limit.

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

Control Device / Emission Unit	Type of Monitoring	Frequency	Range or Specification
Dust Collectors / Woodworking Operations (WW1 & WW2)	Dust Collector inspection	Semi-annual	Verify that it is operated and maintained per manufacturer's specifications

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 8, 2020.

The construction of the proposed new and modified emission units and the operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. 033-43252-00120. The staff recommends to the Commissioner that the New Source Review and MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Michaela Hecox, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.
- (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>.

**Attachment A: Emission Calculations
Summary**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Uncontrolled Potential to Emit Before Integral Controls (tons/yr)										
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single HAP	
Assembly Operation (EU1)	0.41	0.41	0.41	-	-	40.42	-	3.93	0.92	Hexane
Assembly Operation (EU2)	0.51	0.51	0.51	-	-	50.44	-	4.92	1.15	Hexane
Natural Gas Combustion (NG1 through NG6)	0.01	0.05	0.05	3.61E-03	0.60	0.03	0.50	0.01	0.01	Hexane
Aluminum Routers (AW1 and AW4)	3.47	3.47	3.47	-	-	-	-	-	-	-
Woodworking Operation (WW1 and WW2)	147.17	24.53	24.53	-	-	-	-	-	-	-
Paved Roads	2.57	0.51	0.13	-	-	-	-	-	-	-
Total	154.14	29.48	29.09	3.61E-03	0.60	90.90	0.50	8.86	2.08	Hexane

Uncontrolled Potential to Emit After Integral Controls (tons/yr)										
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single HAP	
Assembly Operation (EU1)	0.41	0.41	0.41	-	-	40.42	-	3.93	0.92	Hexane
Assembly Operation (EU2)	0.51	0.51	0.51	-	-	50.44	-	4.92	1.15	Hexane
Natural Gas Combustion (NG1 through NG3)	0.01	0.05	0.05	3.61E-03	0.60	0.03	0.50	0.01	0.01	Hexane
Aluminum Routers (AW1 and AW2)	3.47	3.47	3.47	-	-	-	-	-	-	-
Woodworking Operation (WW1)	7.36	1.23	1.23	-	-	-	-	-	-	-
Paved Roads	2.57	0.51	0.13	-	-	-	-	-	-	-
Total	14.33	6.18	5.79	3.61E-03	0.60	90.90	0.50	8.86	2.08	Hexane

**Appendix A: Emission Calculations
Modification Summary**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

PTE of New Emission Units (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Assembly Operation (EU2)	0.51	0.51	0.51	-	-	50.44	-	4.92
Natural Gas Combustion (NG4 through NG6)	0.01	0.02	0.02	0.00	0.30	0.02	0.25	0.01
Aluminum Routers (AW3 and AW4)	1.73	1.73	1.73	-	-	-	-	-
Woodworking Operation (WW2)	3.68	0.61	0.61	-	-	-	-	-

PTE of Each Emissions Unit Prior to the Modification (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Assembly Operation (EU1)	1.79	1.79	1.79	-	-	8.94	-	0.31
Natural Gas Combustion (NG1 through NG3)	0.01	0.02	0.02	0.00	0.30	0.02	0.25	0.01
Aluminum Routers (AW1 and AW2)	1.73	1.73	1.73	-	-	-	-	-
Woodworking Operation (WW1)	2.80	2.80	2.80	-	-	-	-	-
Paved Roads	1.30	0.26	0.06	-	-	-	-	-

PTE of Each Emissions Unit After the Modification (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Assembly Operation (EU1)	0.41	0.41	0.41	-	-	40.42	-	3.93
Natural Gas Combustion (NG1 through NG3)	0.01	0.02	0.02	0.00	0.30	0.02	0.25	0.01
Aluminum Routers (AW1 and AW2)	1.73	1.73	1.73	-	-	-	-	-
Woodworking Operation (WW1)	3.68	0.61	0.61	-	-	-	-	-
Paved Roads	2.57	0.51	0.13	-	-	-	-	-

PTE Increased of the Modification (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs
Assembly Operation (EU1)	0.00	0.00	0.00	-	-	31.48	-	3.62
Natural Gas Combustion (NG1 through NG3)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Aluminum Routers (AW1 and AW2)	0.00	0.00	0.00	-	-	-	-	-
Woodworking Operation (WW1)	0.88	0.00	0.00	-	-	-	-	-
Paved Roads	1.27	0.25	0.07	-	-	-	-	-
Total PTE Increase of Modification:	8.09	3.14	2.95	0.00	0.30	81.95	0.25	8.55

**Attachment A: Emission Calculations
Assembly Operation (EU-1)**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Material	SDS ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons per day	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Application Method	Substrate*	
Polyvinyl Acetate Emulsion	100322	9.51	0.00%	0.00%	0.00%	0.00%	100.00%	0.668	1.000	16.032	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Extrusion	W	
Geocel 2300 Vehicle Body Sealant Clear	100055	8.01	33.12%	0.00%	33.12%	0.00%	66.88%	1.150	1.000	27.600	2.65	2.65	3.05	73.24	13.37	0.00	3.97	100%	Caulk	W,M	
SikaFlex-232 US	102569	10.60	2.12%	0.00%	2.12%	0.00%	95.00%	0.624	1.000	14.976	0.22	0.22	0.14	3.37	0.61	0.00	0.24	100%	Caulk	W	
STA-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	8.39	56.38%	0.00%	56.38%	0.00%	30.00%	0.250	1.000	6.000	4.73	4.73	1.18	28.38	5.18	0.00	-	100%	nonatomized adhesive spray application	W,P	
935BA (935BA Water Base Adhesive)	102987	8.10	0.00%	0.00%	0.00%	0.00%	54.90%	0.730	1.000	17.520	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Caulk	W,P	
Superbond RV Bond	100323	5.37	68.36%	0.00%	68.36%	0.00%	4.50%	0.267	1.000	6.408	3.67	3.67	0.98	23.52	4.29	0.00	81.58	100%	Caulk	W,P	
502 LSW	100163	9.93	30.61%	0.00%	30.61%	0.00%	67.50%	0.402	1.000	9.648	3.04	3.04	1.22	29.33	5.35	0.00	4.50	100%	Caulk	P,M	
Geocel 2300 Vehicle Body Sealant, Black	101263	8.01	33.02%	0.00%	33.02%	0.00%	66.98%	0.224	1.000	5.376	2.65	2.65	0.59	14.22	2.60	0.00	3.95	100%	Caulk	M,P	
SikaTack Ultrafast US	100199	10.01	29.93%	0.00%	29.93%	0.00%	70.07%	0.180	1.000	4.320	3.00	3.00	0.54	12.94	2.36	0.00	4.28	100%	Caulk	W	
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	12.35	0.20%	0.00%	0.20%	0.00%	70.00%	0.116	1.000	2.784	0.02	0.02	0.00	0.07	0.01	0.00	-	100%	Caulk	M,P	
TREMPRO 644 RTV CLEAR	102681	8.47	0.10%	0.00%	0.10%	0.00%	98.00%	0.034	1.000	0.816	0.01	0.01	0.00	0.01	0.00	0.00	0.01	100%	Caulk	W,G	
Silicone Spray	100260	5.34	60.00%	0.00%	60.00%	0.00%	40.00%	0.012	1.000	0.288	3.20	3.20	0.04	0.92	0.17	0.04	8.01	65%	Aerosol	M	
COLOR PUTTY OIL-BASE 100-White 102	100255	17.53	11.00%	10.52%	0.48%	10.52%	89.00%	0.022	1.000	0.528	0.09	0.08	0.00	0.04	0.01	0.00	0.09	100%	Manual	W,P	
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	7.43	32.27%	0.00%	32.27%	0.00%	30.00%	0.027	1.000	0.648	2.40	2.40	0.06	1.55	0.28	0.00	7.99	100%	Wipe	P	
CASA Anti-Wick	100769	8.43	3.76%	0.00%	3.76%	0.00%	55.00%	0.018	1.000	0.432	0.32	0.32	0.01	0.14	0.02	0.00	0.58	100%	Extrusion	W	
551LSW	102667	9.81	32.08%	0.00%	32.08%	0.00%	67.92%	0.039	1.000	0.936	3.15	3.15	0.12	2.95	0.54	0.00	-	100%	Caulk	P,M	
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	8.76	46.00%	45.99%	0.01%	45.99%	54.00%	0.731	1.000	17.544	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Caulk	W	
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	9.18	15.00%	0.00%	15.00%	0.00%	85.00%	0.057	1.000	1.368	1.38	1.38	0.08	1.88	0.34	0.00	1.62	100%	Expanding Foam	W,P	
Cleaning materials																					
Boring Smith Panel Hold Cleaner	101483	6.59	80.00%	80.00%	0.00%	80.00%	20.00%	0.004	1.000	0.096	0.00	0.00	0.00	0.00	0.00	0.01	0.00	65%	Aerosol	M	
GLASS CLEANER	100202	8.24	11.25%	0.00%	9.71%	0.00%	88.75%	0.029	1.000	0.696	0.80	0.80	0.02	0.56	0.10	0.32	0.90	65%	Aerosol	G	
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	6.80	98.00%	0.00%	98.00%	0.00%	0.00%	0.175	1.000	4.200	6.66	6.66	1.17	27.99	5.11	0.04	#DIV/0!	65%	Aerosol	M,P,G	
Dawn Professional Dish Detergent	100749	8.35	62.98%	57.82%	5.15%	57.82%	37.03%	0.036	1.000	0.864	1.02	0.43	0.02	0.37	0.07	0.00	1.16	100%	Wipe	M,P,G	
Potential to Emit:													9.23	221.50	40.42	0.41					

*Substrate Abbreviations are as follows:

- G = Glass
- M = Metal
- P = Plastic
- W = Wood

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) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Attachment A: Emission Calculations
Assembly Operation (EU-1) HAPs**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Material	MDSID ID#	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Xylene	Weight % MDI*	Weight % Toluene	Weight % Ethyl Benzene	Weight % Hexane
Polyvinyl Acetate Emulsion	100322	0.668	1.000						
Geocel 2300 Vehicle Body Sealant Clear	100055	1.150	1.000	2.00%					
Sikaflex-232 US	102569	0.624	1.000		1.50%	1.00%		1.00%	
STA'-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	0.250	1.000						10.00%
935BA (935BA Water Base Adhesive)	102987	0.730	1.000						
Superbond RV Bond	100323	0.267	1.000						
502 LSW	100163	0.402	1.000						
Geocel 2300 Vehicle Body Sealant, Black	101263	0.224	1.000						
SikaTack Ultrafast US	100199	0.180	1.000		3.50%	1.00%		1.00%	
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	0.116	1.000			0.44%			
TREMPRO 644 RTV CLEAR	102681	0.034	1.000						
Silicone Spray	100260	0.012	1.000						
COLOR PUTTY OIL-BASE 100-White 102-Na	100255	0.022	1.000						
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	0.027	1.000						
CASA Anti-Wick	100769	0.018	1.000						
551LSW	102667	0.039	1.000						
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	0.731	1.000				2.00%		
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	0.057	1.000			7.50%			
Cleaning materials									
Boring Smith Panel Hold Cleaner	101483	0.004	1.000						
GLASS CLEANER	100202	0.029	1.000						
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	0.175	1.000						
Dawn Professional Dish Detergent	100749	0.036	1.000						

Material	Density (lbs/gal)	Usage (lbs/hr)	Cumene Emissions (tons/year)	Xylene Emissions (tons/year)	MDI* Emissions (tons/year)	Toluene Emissions (tons/year)	Ethyl Benzene Emissions (tons/year)	Hexane Emissions (tons/year)
Polyvinyl Acetate Emulsion	100322	6.35	0.000	0.000	0.000	0.000	0.000	0.000
Geocel 2300 Vehicle Body Sealant Clear	100055	9.21	0.807	0.000	0.000	0.000	0.000	0.000
Sikaflex-232 US	102569	6.61	0.000	0.435	0.290	0.000	0.290	0.000
STA'-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	2.10	0.000	0.000	0.000	0.000	0.000	0.919
935BA (935BA Water Base Adhesive)	102987	5.91	0.000	0.000	0.000	0.000	0.000	0.000
Superbond RV Bond	100323	1.43	0.000	0.000	0.000	0.000	0.000	0.000
502 LSW	100163	3.99	0.000	0.000	0.000	0.000	0.000	0.000
Geocel 2300 Vehicle Body Sealant, Black	101263	1.79	0.000	0.000	0.000	0.000	0.000	0.000
SikaTack Ultrafast US	100199	1.80	0.000	0.276	0.079	0.000	0.079	0.000
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	1.43	0.000	0.000	0.028	0.000	0.000	0.000
TREMPRO 644 RTV CLEAR	102681	0.29	0.000	0.000	0.000	0.000	0.000	0.000
Silicone Spray	100260	0.06	0.000	0.000	0.000	0.000	0.000	0.000
COLOR PUTTY OIL-BASE 100-White 102-Na	100255	0.39	0.000	0.000	0.000	0.000	0.000	0.000
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	0.20	0.000	0.000	0.000	0.000	0.000	0.000
CASA Anti-Wick	100769	0.15	0.000	0.000	0.000	0.000	0.000	0.000
551LSW	102667	0.38	0.000	0.000	0.000	0.000	0.000	0.000
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	6.41	0.000	0.000	0.000	0.561	0.000	0.000
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	0.52	0.000	0.000	0.172	0.000	0.000	0.000
Cleaning materials								
Boring Smith Panel Hold Cleaner	101483	0.03	0.000	0.000	0.000	0.000	0.000	0.000
GLASS CLEANER	100202	0.24	0.000	0.000	0.000	0.000	0.000	0.000
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	1.19	0.000	0.000	0.000	0.000	0.000	0.000
Dawn Professional Dish Detergent	100749	0.30	0.000	0.000	0.000	0.000	0.000	0.000
Total			0.81	0.71	0.57	0.56	0.37	0.92

Worst Case Single HAP Emissions:	0.92	Hexane
Total HAPs:	3.93	

**Attachment A: Emission Calculations
Assembly Operation (EU-2)**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Material	SDS ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gallons per day	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Application Method	Substrate*	
Polyvinyl Acetate Emulsion	100322	9.51	0.00%	0.00%	0.00%	0.00%	100.00%	0.668	1.250	20.040	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Extrusion	W	
Geocel 2300 Vehicle Body Sealant Clear	100055	8.01	33.12%	0.00%	33.12%	0.00%	66.88%	1.150	1.250	34.500	2.65	2.65	3.81	91.55	16.71	0.00	3.97	100%	Caulk	W,M	
Sikaflex-232 US	102569	10.60	2.12%	0.00%	2.12%	0.00%	95.00%	0.624	1.250	18.720	0.22	0.22	0.18	4.21	0.77	0.00	0.24	100%	Caulk	W	
STA-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	8.39	56.38%	0.00%	56.38%	0.00%	30.00%	0.250	1.250	7.500	4.73	4.73	1.48	35.48	6.47	0.00	-	100%	nonatomized adhesive spray application	W,P	
935BA (935BA Water Base Adhesive)	102987	8.10	0.00%	0.00%	0.00%	0.00%	54.90%	0.730	1.250	21.900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Caulk	W,P	
Superbond RV Bond	100323	5.37	68.36%	0.00%	68.36%	0.00%	4.50%	0.267	1.250	8.010	3.67	3.67	1.23	29.40	5.37	0.00	81.58	100%	Caulk	W,P	
502 LSW	100163	9.93	30.61%	0.00%	30.61%	0.00%	67.50%	0.402	1.250	12.060	3.04	3.04	1.53	38.66	6.69	0.00	4.50	100%	Caulk	P,M	
Geocel 2300 Vehicle Body Sealant, Black	101263	8.01	33.02%	0.00%	33.02%	0.00%	66.98%	0.224	1.250	6.720	2.65	2.65	0.74	17.78	3.24	0.00	3.95	100%	Caulk	M,P	
SikaTack Ultrafast US	100199	10.01	29.93%	0.00%	29.93%	0.00%	70.07%	0.180	1.250	5.400	3.00	3.00	0.67	16.18	2.95	0.00	4.28	100%	Caulk	W	
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	12.35	0.20%	0.00%	0.20%	0.00%	70.00%	0.116	1.250	3.480	0.02	0.02	0.00	0.09	0.02	0.00	-	100%	Caulk	M,P	
TREMPRO 644 RTV CLEAR	102681	8.47	0.10%	0.00%	0.10%	0.00%	98.00%	0.034	1.250	1.020	0.01	0.01	0.00	0.01	0.00	0.00	0.01	100%	Caulk	W,G	
Silicone Spray	100260	5.34	60.00%	0.00%	60.00%	0.00%	40.00%	0.012	1.250	0.360	3.20	3.20	0.05	1.15	0.21	0.05	8.01	65%	Aerosol	M	
COLOR PUTTY OIL-BASE 100-White 102	100255	17.53	11.00%	10.52%	0.48%	10.52%	89.00%	0.022	1.250	0.660	0.09	0.08	0.00	0.06	0.01	0.00	0.09	100%	Manual	W,P	
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	7.43	32.27%	0.00%	32.27%	0.00%	30.00%	0.027	1.250	0.810	2.40	2.40	0.08	1.94	0.35	0.00	7.99	100%	Wipe	P	
CASA Anti-Wick	100769	8.43	3.76%	0.00%	3.76%	0.00%	55.00%	0.018	1.250	0.540	0.32	0.32	0.01	0.17	0.03	0.00	0.58	100%	Extrusion	W	
551LSW	102667	9.81	32.08%	0.00%	32.08%	0.00%	67.92%	0.039	1.250	1.170	3.15	3.15	0.15	3.68	0.67	0.00	-	100%	Caulk	P,M	
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	8.76	46.00%	45.99%	0.01%	45.99%	54.00%	0.731	1.250	21.930	0.00	0.00	0.00	0.02	0.00	0.00	0.00	100%	Caulk	W	
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	9.18	15.00%	0.00%	15.00%	0.00%	85.00%	0.057	1.250	1.710	1.38	1.38	0.10	2.35	0.43	0.00	1.62	100%	Expanding Foam	W,P	
Cleaning materials																					
Boring Smith Panel Hold Cleaner	101493	6.59	80.00%	80.00%	0.00%	80.00%	20.00%	0.004	1.250	0.120	0.00	0.00	0.00	0.00	0.00	0.01	0.00	65%	Aerosol	M	
GLASS CLEANER	100202	8.24	11.25%	0.00%	9.71%	0.00%	88.75%	0.029	1.250	0.870	0.80	0.80	0.03	0.70	0.13	0.41	0.90	65%	Aerosol	G	
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	6.80	98.00%	0.00%	98.00%	0.00%	0.00%	0.175	1.250	5.250	6.66	6.66	1.46	34.99	6.38	0.05	#DIV/0!	65%	Aerosol	M,P,G	
Dawn Professional Dish Detergent	100749	8.35	62.98%	57.82%	5.15%	57.82%	37.03%	0.036	1.250	1.080	1.02	0.43	0.02	0.46	0.08	0.00	1.16	100%	Wipe	M,P,G	
Potential to Emit:													11.52	276.40	50.44	0.51					

*Substrate Abbreviations are as follows:

- G = Glass
- M = Metal
- P = Plastic
- W = Wood

METHODOLOGY

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

**Attachment A: Emission Calculations
Assembly Operation (EU-2) HAPS**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Material	MDSD ID#	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Xylene	Weight % MDI*	Weight % Toluene	Weight % Ethyl Benzene	Weight % Hexane
Polyvinyl Acetate Emulsion	100322	0.668	1.250						
Geocel 2300 Vehicle Body Sealant Clear	100055	1.150	1.250	2.00%					
Sikaflex-232 US	102569	0.624	1.250		1.50%	1.00%		1.00%	
STA'-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	0.250	1.250						10.00%
935BA (935BA Water Base Adhesive)	102987	0.730	1.250						
Superbond RV Bond	100323	0.267	1.250						
502 LSW	100163	0.402	1.250						
Geocel 2300 Vehicle Body Sealant, Black	101263	0.224	1.250						
SikaTack Ultrafast US	100199	0.180	1.250		3.50%	1.00%		1.00%	
Boring Smith Panel Hold Cleaner	101483	#REF!	#REF!						
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	0.116	1.250			0.44%			
TREMPRO 644 RTV CLEAR	102681	0.034	1.250						
Silicone Spray	100260	0.012	1.250						
COLOR PUTTY OIL-BASE 100-White 102-Na	100255	0.022	1.250						
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	0.027	1.250						
CASA Anti-Wick	100769	0.018	1.250						
551LSW	102667	0.039	1.250						
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	0.731	1.250				2.00%		
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	0.057	1.250			7.50%			
Cleaning materials									
Boring Smith Panel Hold Cleaner	101483	0.004	1.250						
GLASS CLEANER	100202	0.029	1.250						
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	0.175	1.250						
Dawn Professional Dish Detergent	100749	0.036	1.250						

Material	Density (lbs/gal)	Usage (lbs/hr)	Cumene Emissions (tons/year)	Xylene Emissions (tons/year)	MDI* Emissions (tons/year)	Toluene Emissions (tons/year)	Ethyl Benzene Emissions (tons/year)	Hexane Emissions (tons/year)
Polyvinyl Acetate Emulsion	100322	7.94	0.000	0.000	0.000	0.000	0.000	0.000
Geocel 2300 Vehicle Body Sealant Clear	100055	11.52	1.009	0.000	0.000	0.000	0.000	0.000
Sikaflex-232 US	102569	8.27	0.000	0.543	0.362	0.000	0.362	0.000
STA'-PUT Big Sticky Multi-Purpose Canister Adhesive	100122	2.62	0.000	0.000	0.000	0.000	0.000	1.148
935BA (935BA Water Base Adhesive)	102987	7.39	0.000	0.000	0.000	0.000	0.000	0.000
Superbond RV Bond	100323	1.79	0.000	0.000	0.000	0.000	0.000	0.000
502 LSW	100163	4.99	0.000	0.000	0.000	0.000	0.000	0.000
Geocel 2300 Vehicle Body Sealant, Black	101263	2.24	0.000	0.000	0.000	0.000	0.000	0.000
SikaTack Ultrafast US	100199	2.25	0.000	0.345	0.099	0.000	0.099	0.000
Geocel 3300 Professional Grade Polyurethane Sealant Black	103764	1.79	0.000	0.000	0.035	0.000	0.000	0.000
TREMPRO 644 RTV CLEAR	102681	0.36	0.000	0.000	0.000	0.000	0.000	0.000
Silicone Spray	100260	0.08	0.000	0.000	0.000	0.000	0.000	0.000
COLOR PUTTY OIL-BASE 100-White 102-Na	100255	0.48	0.000	0.000	0.000	0.000	0.000	0.000
OATEY CANADIAN PREMIUM ABS YELLOW CEMENT	100064	0.25	0.000	0.000	0.000	0.000	0.000	0.000
CASA Anti-Wick	100769	0.19	0.000	0.000	0.000	0.000	0.000	0.000
551LSW	102667	0.48	0.000	0.000	0.000	0.000	0.000	0.000
3011, 3015, 3080, 8100, 8120 VAE adhesive	100018	8.01	0.000	0.000	0.000	0.701	0.000	0.000
Power Hold Window & Door Gun Foam, Power Hold RV Black Foam	102571	0.65	0.000	0.000	0.215	0.000	0.000	0.000
Cleaning materials								
Boring Smith Panel Hold Cleaner	101483	0.03	0.000	0.000	0.000	0.000	0.000	0.000
GLASS CLEANER	100202	0.30	0.000	0.000	0.000	0.000	0.000	0.000
CD757 Heavy Duty Citrus Degreaser Aerosol	100437	1.49	0.000	0.000	0.000	0.000	0.000	0.000
Dawn Professional Dish Detergent	100749	0.38	0.000	0.000	0.000	0.000	0.000	0.000
Total			1.01	0.89	0.71	0.70	0.46	1.15

Worst Case Single HAP Emissions:	1.15	Hexane
Total HAPS	4.92	

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

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Unit	Heat Input Capacity MMBtu/hr		HHV mmBtu mmscf	Potential Throughput MMCF/yr
NG1	0.4	One space heater @ 0.4 MMBtu/hr		
NG2	0.2	One space heater @ 0.2 MMBtu/hr		
NG3	0.1	One space heater @ 0.1 MMBtu/hr		
NG4	0.4	One space heater @ 0.4 MMBtu/hr		
NG5	0.2	One space heater @ 0.2 MMBtu/hr		
NG6	0.1	One space heater @ 0.1 MMBtu/hr		
	1.4		1020	12.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.05	0.05	0.00	0.60	0.03	0.50

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.3E-05	7.2E-06	4.5E-04	0.01	2.0E-05	0.01

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.0E-06	6.6E-06	8.4E-06	2.3E-06	1.3E-05	3.3E-05
					Total HAPs	0.01
					Worst HAP	0.01

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
Miscellaneous Aluminum Cutting AW1 through AW4

Company Name: Forest River Inc., Plant 79
Address City IN Zip: 685 E Main St., Butler, IN 46721
Permit No.: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Cutting

Process/Operation	Material Thickness (in)	Cutting Surface Thickness (in)	Process rate (in/unit)	Material Loss (in ³ /unit)	Material Density (lb/in ³)	Material Loss (lb/unit)	Throughput (units/hr)	Material Loss (lb/hr)
Siding Operation								
Aluminum Router AW1 (Bld 1)	0.025	0.25	900.0	5.625	0.088	0.50	0.40	0.20
Aluminum Router AW2 (Bld 1)	0.025	0.25	900.0	5.625	0.088	0.50	0.40	0.20
Aluminum Router AW3 (Bld 2)	0.025	0.25	900.0	5.625	0.088	0.50	0.40	0.20
Aluminum Router AW4 (Bld 2)	0.025	0.25	900.0	5.625	0.088	0.50	0.40	0.20
Potential to Emit PM/PM10/PM2.5 (lb/hr)								0.792
Potential to Emit PM/PM10/PM2.5 (tons/yr):								3.47

METHODOLOGY

Material Loss (in³/hr) = Surface Thickness (in) X Surface Width (in) X Surface Distance (in/hr)

Material Density (lbs/in³) = Data from O'Neal Steel, Inc. Stock List and Reference Book, 1999

Estimated Emissions (lb/hr) = Material Loss (in³/hr) X Material Density (lb/in³)

Estimated Emissions (tons/yr) = Material Loss (in³/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)

Allowable Emission Rate (lb/hr) = 4.1 x [Material Input Rate (lb/hr) / 2,000 (lb/ton)]^{0.67}

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi Trailer (entering plant) (one-way trip)	15.0	1.0	15.0	32.0	480.0	680	0.129	1.9	705.1
Semi Trailer (leaving plant) (one-way trip)	15.0	1.0	15.0	16.0	240.0	680	0.129	1.9	705.1
Completed RV (exiting plant) (one-way)	16.0	1.0	16.0	3.5	56.0	2000	0.379	6.1	2212.1
Totals			46.0		776.0			9.9	3622.3

Average Vehicle Weight Per Trip =

16.9	tons/trip
------	-----------

 Average Miles Per Trip =

0.22	miles/trip
------	------------

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	16.9	16.9	16.9	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
 where p =

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
-----	---

 N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.552	0.310	0.0762	lb/mile
Mitigated Emission Factor, Eext =	1.419	0.284	0.0697	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Semi Trailer (entering plant) (one-way trip)	0.50	0.10	0.02
Semi Trailer (leaving plant) (one-way trip)	0.50	0.10	0.02
Completed RV (exiting plant) (one-way)	1.57	0.31	0.08
Totals	2.57	0.51	0.13

Methodology

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

Abbreviations

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

**Attachment A: Emission Calculations
Woodworking Calculations
WW1 and WW2**

Company Name: Forest River Inc., Plant 79
Source Address: 685 E Main St., Butler, IN 46721
Permit Number: M 033-43252-00120
Reviewer: Michaela Hecox
Date: 9/21/2020

WW1	Wood Processed per hour (lbs/hr)	Sawdust %	% Emissions per lb of Sawdust	Uncontrolled Emissions (lb/hr)	Uncontrolled Emissions (Tons/yr)	Controlled Emissions (lb/hr)	Controlled Emissions (Tons/yr)
PM	14000	2.00%	6.00%	16.8	73.58	0.84	3.68
PM10	14000	2.00%	1.00%	2.8	12.26	0.14	0.61
PM2.5	14000	2.00%	1.00%	2.80	12.26	0.14	0.61

WW2	Wood Processed per hour (lbs/hr)	Sawdust %	% Emissions per lb of Sawdust	Uncontrolled Emissions (lb/hr)	Uncontrolled Emissions (Tons/yr)	Controlled Emissions (lb/hr)	Controlled Emissions (Tons/yr)
PM	14000	2.00%	6.00%	16.8	73.58	0.84	3.68
PM10	14000	2.00%	1.00%	2.8	12.26	0.14	0.61
PM2.5	14000	2.00%	1.00%	2.80	12.26	0.14	0.61

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

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

PM2.5: (Process weight rate lb/hour)*(Percent sawdust)*(Percent PM2.5 of sawdust)*(8,760hr/year)*(1 ton/2000 lb)

Weight calculations from similar operations shows conversion of 2% of the process rate weight of pre finished panels and lumber is converted into sawdust. Particle size analyses for RV woodworking operations shows that this sawdust is typically 6% particulate matter and 1% of it is PM10 (From Title V permit for Forest River, Topeka Complex #087-41087-00052). PM2.5 has been assumed to be the same value as PM10.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

William Conway
Forest River, Inc. - Plant 79
PO Box 3030
Elkhart, IN 46515

October 16, 2020

Re: Public Notice
Forest River, Inc. - Plant 79
Permit Level: MSOP – with New Source Review
Permit Number: 033-43252-00120

Dear Mr. William Conway:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43252

and

IDEM's Virtual File Cabinet (VFC): <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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

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

OAQ has submitted the draft permit package to the Butler Public Library, 340 South Broadway Street in Butler, IN 46721. 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 draft permit 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 Michaela Hecox, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 16, 2020

To: Butler Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Forest River, Inc. – Plant 79
Permit Number: 033-43252-00120

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 Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

October 16, 2020

Forest River, Inc. – Plant 79
033-43252-00120

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

Mail Code 61-53

IDEM Staff	KBOURQUE		October 16, 2020	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		William Conway Forest River Incorporated Plant 79 PO Box 3030 Elkhart IN 46515 (Source CAATS)										
2		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
3		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
6		DeKalb County Health Department 220 E 7th St, Ste 110 Auburn IN 46706 (Health Department)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
9		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
10		Butler City Council and Mayors Office 215 S. Broadway St. Butler IN 46721 (Local Official)										
11		Butler Public Library 340 S Broadway St Butler IN 46721-1308 (Library)										
12		Nucor Building Products 305 Industrial Parkway Waterloo IN 46793 (Affected Party)										
13		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)										
14		Dean A. & Kathy J. Malcolm 7157 County Road 34 Butler IN 46721 (Affected Party)										
15		Larry E. & Patricia L. Erwin 2824 County Road 71 Butler IN 46721 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Thomas L. 7117 US Highway 6 Butler IN 46721 (Affected Party)										
2		Rita M. Carnahan 7104 County Road 28 Butler IN 46721 (Affected Party)										
3		Dark Harbor Enterprises 336 North Main Street Bryan OH 43506 (Affected Party)										
4		HTIW Properties LLC PO Box 744 Wakarusa IN 46573 (Affected Party)										
5		Laub Trust PO Box 36 Butler IN 46721 (Affected Party)										
6		DeKalb County Eastern Community School District 300 East Washington Street Butler IN 46721 (Affected Party)										
7		Mr. Donald D. Grogg DeKalb County Commissioners 6250 CR 31 Auburn IN 46706 (Affected Party)										
8		Michael Furfaro DECA Environmental & Associates, Inc. 410 1st Ave Carmel IN 46032 (Consultant)										
9		Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)										
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