

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
<u>SOURCE NAME</u>	Forest River Sunseeker Complex
<u>SOURCE LOCATION</u>	914 CR 1, 902 CR 1, and 55135 CR 1, Elkhart, IN 46514 Elkhart County
<u>MAILING ADDRESS</u>	914 CR 1, 902 CR 1, and 55135 CR 1, Elkhart, IN 46514
<u>PLANT ID</u>	039-00126
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 42469 Permit Expiration Date: 11/15/2024 VFC Document No.(hyperlink): <a href="#">82934675</a>
<u>ATTAINMENT STATUS</u>	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> CO <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> NO <sub>2</sub> <input type="checkbox"/> Pb <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub>
<u>SOURCE STATUS</u>	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	Forest River Sunseeker Complex owns and operates a stationary motorhome and bus(coach) assembly source.

INSPECTION INFORMATION						
<u>INSPECTED BY</u>	Paul Karkiewicz <i>JK</i>					
<u>INSPECTION DATE AND TIME</u>	12/15/2020	TIME IN: 0900	TIME OUT: 1210			
<u>REPORTED BY</u>	Paul Karkiewicz <i>PSK</i>	REPORT DATE: 12/16/2020				
<u>COMPLIANCE PERIOD REVIEWED</u>	November 2019 to November 2020					
<u>INSPECTION NOTIFICATION**</u>	<input type="checkbox"/> Unannounced <input checked="" type="checkbox"/> Announced: Due to COVID-19, inspection was announced on December 14, 2020 to determine operational status and additional PPE requirements.					
<u>INSPECTION OBJECTIVE(S)</u>	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance					
<u>ACES TRACKING NUMBER(S)</u>	Inspection:	253229	Complaint:	N/A	Violation/Warning:	253230
<u>RM TRACKING NUMBER(S)</u>	Complaint:	N/A				
<u>INSPECTION BACKGROUND</u>	The last inspection of this source was performed on 09/21/2012. At that time, it was known as Forest River, Inc. - Glaval Bus Division and operated under MSOP No. M039-28511-00126. No violations were determined during this inspection.					

<b>SOURCE PERSONNEL INTERVIEWED</b>			
<i>Name</i>	<i>Title</i>	<i>Phone Number</i>	<i>Email Address</i>
William Conway Jr.	Corporate Engineer	574-534-6913	bconway@forestriverinc.com
Mike Williams	Production & Safety Mgr. / Sunseeker Line		
Dave Tubiczak	Production Mgr. / Elkhart Coach Line		
David Lorence	Production Mgr. / Berkshire Coach Line		
Shawn Kidder	Safety & Maintenance Mgr./Georgetown Line		

<b>INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)</b>			
<i>Date</i>	<i>Inspection/Complaint Type</i>	<i>Result</i>	<i>Comments</i>
N/A	OTHER	N/A	No inspections or complaint within the previous 5 years

<b>COMPLIANCE HISTORY (PREVIOUS 5 YEARS)</b>			
<b><u>Informal Enforcement Actions</u></b>			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
N/A	N/A	No informal enforcement actions within the previous 5 years.	
<b><u>Formal Enforcement Actions</u></b>			
<i>Case Number</i>	<i>Enforcement Type</i>	<i>Civil Penalty</i>	<i>Describe Violation(s)</i>
N/A	N/A	\$ N/A	No formal enforcement actions within the previous 5 years.
<b><u>Other Relevant Actions</u></b>			
<i>Action Taken</i>	<i>Comments</i>		
N/A	N/A		

<b>PERMIT SECTION D.1</b>		
<b>Emission Units and Control Devices:</b>		
<b>Emissions Unit Description:</b>		
<u>Plant 34 - 914 CR 1, Elkhart, IN 46514</u>		
(a)	One (1) recreation vehicle (RV) assembly lines, identified as EU-1, equipped with wiping or extruding applicators and spray cans, constructed in 1999, exhausting to inside, capacity: 2.4 units per hour, coating plastic parts.	
(f)	One (1) Assembly Line, identified as EU-8, approved in 2020 for construction, with a maximum capacity of 6 units per day, without control, and exhausting inside.	
<u>Plant 68 - 902 CR 1, Elkhart, IN 46514</u>		
(j)	One (1) recreation vehicle (RV) assembly line, identified as EU-6, approved in 2016 for construction, used for applying and surface coating metal with numerous glues, adhesives, caulks, sealants, and paints, with a maximum capacity of two (2) motorized recreational vehicle per hour, using no control equipment, and exhausting indoors.	
(k)	One (1) woodworking operation, identified as WW-1, approved in 2016 for construction, with a maximum capacity of one (1) motorized recreational vehicle per hour, using a dust collector as control, and exhausting to stack V-01.	
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)		
<b>Pollutants with Emission Limits or Applicable Standards:</b>		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS		
<b>Applicable Rules:</b>		
• 326 IAC 2-8 (FESOP Limits), 326 IAC 6-3-2 (Particulate Control), 326 IAC 8-2-9 (Miscellaneous Metal Coatings - Emission Limits & Work Practices), 326 IAC 1-6-3 (Preventive Maintenance Plans)		
<b>Requirement:</b>	<b>Applicable</b>	<b>Violation Noted</b>
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Types of Records Reviewed: Safety Data Sheets, Monthly VOC usage records, Monthly VOC emission records, Metal Coating records, Preventive Maintenance Plan, Monitoring Records		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Observations and Comments:</b>		
On 12/15/2020, the IDEM, NRO – Air Compliance Section performed a CMS'21 Inspection of Forest River – Sunseeker Complex. Mr. Conway provided a tour of the production operations.		
<u>Plant 34</u>		
Sunseeker (Class “C” Motorhomes) – Production Rate is 16 units/day.		
Elkhart Coach (buses) – Production Rate is 4 units/day		
Berkshire Coach (shuttles) – Production Rate is 1 unit/week.		
<u>Plt. 68</u>		
Georgetown (Class “A” Motorhomes)		
Sean Kidder, Safety Manager, did not have information on current production rates since the Plant Manager was out.		

**PERMIT SECTION D.1**

Only 3<sup>rd</sup> Quarter Baghouse Inspection records were available for review. Mr. Conway and Mr. Kidder had misunderstood that the permit required Baghouse inspections were to be recorded semi-annually. No emission problems were observed during a check of the outdoor Baghouse dust collector.

Materials used in RV/coach assembly include Oatey ABS cement, Soudal, ASI 504, and Sika caulks, Dicor 502 LSW roof sealant, AAT and Tarkett vinyl floor adhesive, Premier PB-999 and Sta'Put 2001 spray cannister (glue insulation). The lamination process uses ISS – Dura UL4707 and Loctite UR 8345.

Wipe-down of units is performed using isopropyl alcohol, mineral spirits, and some use of DT-10 lacquer thinner. Touch and Seal Foam 500 CCMC (Part A + Part B) expandable foam, which has no particulate overspray potential, is used for undercoating of Class "C" motorhomes in Plant 34.

Most touch-up painting uses aerosol spray cans. There is a small amount of minor touch-up using Chromax paints.

The source emailed material usage and VOC emission records to IDEM prior to the inspection.

<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observed</i>
Woodworking Baghouse Dust Collector	N/A	N/A	No emissions observed.

**Permit Section Compliance Status:**

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

<i>Condition/Citation</i>	<i>Comments</i>
D.1.9(b) Record Keeping Requirements	Records of Baghouse Inspections were available for 11/25/2020. However, these inspections are not being recorded on a Quarterly basis as required by the FESOP.

<b>PERMIT SECTION D.2</b>			
<b>Emission Units and Control Devices:</b>			
Emissions Unit Description:			
<u>Buildings B and E - 55135 CR 1, Elkhart, IN 46514</u>			
(n) Building B - One (1) under coating booth, identified as EU-9, approved in 2020 for construction, with a maximum capacity of 6 units per day and using 2.56 gallons of coating per unit, using dry filters as control, and exhausting outside.			
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)			
<b>Pollutants with Emission Limits or Applicable Standards:</b>			
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS			
<b>Applicable Rules:</b>			
<ul style="list-style-type: none"> <li>• 326 IAC 2-8 (FESOP), 326 IAC 6-3-2 (Particulate Emission Limitations &amp; Control), 326 IAC 1-6-3 (Preventive Maintenance Plans)</li> </ul>			
<b>Requirement:</b>		<b>Applicable</b>	<b>Violation Noted</b>
Emission Limitations and Standards		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Testing Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Types of Records Reviewed: Material Usage and Emissions Records, Preventive Maintenance Plan			
Reporting Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Observations and Comments:</b>			
<p><b>Building B</b>                      Undercoating of coaches from Plant 34 uses Touch and Seal Foam 500 CCMC (Part A + Part B) expandable foam, which has no particulate overspray potential.                      Dry filters were not installed at the booth. However, it was not in operation at the time of the inspection.                      The source has not been performing/recording Monitoring Inspections at the booth.</p> <p>The source emailed material usage and VOC emission records to IDEM prior to the inspection.</p>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observed</i>
Dry filter	N/A	N/A	
<b>Permit Section Compliance Status:</b>			
<input type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input checked="" type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:			
<i>Condition/Citation</i>		<i>Comments</i>	
D.2.3 Monitoring, D.2.4 Record Keeping		The source is not performing and recording Monitoring Inspections at booth as required.	

**ADDITIONAL SOURCE COMPLIANCE REVIEW:**

The following reports are required and were reviewed:

Annual Compliance Certification(s)       Deviation & Compliance Monitoring Report(s)  
 Annual Notification(s)                       Emission Statement(s)

The reports are consistent with inspection observations.  Yes  No  N/A

The permit accurately represents emission units observed on site.  Yes  No  N/A

Compliance assistance was provided during the inspection.  Yes  No  N/A

The source is required to have a Risk Management Plan [40 CFR 68].  Yes  No

If yes, the source has a plan.  Yes  No  N/A

If yes, the employees have been trained.  Yes  No  N/A

**Additional Information and Comments:**

Building E (See A.3 Emission Units and Pollution Control Equipment)  
 Primer Surface Coating of coaches (buses) from Plant 34 is performed here.  
 No coaches were being coated at the Primer Surface Coating Area at the time of the inspection.  
 Helios (Nanochem) WB Grey Primer (0.77 lbs./gallon VOC) is currently being used for primer surface coating.  
 Dry Filters were installed.

**Additional Source Compliance Review Status:**

No violations were observed or determined at the time of the inspection.  
 The following violations were determined at the time of the inspection:

<i>Condition/Citation</i>	<i>Description of Violation(s)</i>

**INSPECTION FINDINGS**

No violations were observed or determined at the time of the inspection.  
 The following violations were determined at the time of the inspection:

<i>Condition/Citation</i>	<i>Description of Violation(s)</i>
D.1.9(b) Record Keeping Requirements	Records of Baghouse Inspections were available for 11/25/2020. However, these inspections are not being recorded on a Quarterly basis as required by the FESOP.
D.2.3 Monitoring, D.2.4 Record Keeping	The source is not performing and recording Monitoring Inspections at booth as required.

<b>RECOMMENDED ACTION</b>	Issue inspection summary/violation letter.
<b>EXIT INTERVIEW</b>	I explained my findings, recommendations, and conclusions with Mr. Conway prior to exiting the facility.

**ATTACHMENTS**

- Inspection Summary / Violation Letter