

#### 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

Brian C. Rockensuess

Commissioner

To: Interested Parties

Date: July 2, 2024

From: Jenny Acker, Chief

Permits Branch Office of Air Quality

Source Name: Keystone Recreational Vehicle Company Plant 340

Permit Level: MSOP Administrative Amendment

Permit Number: 039-47937-00748

Source Location: 72440 State Road 13, Syracuse, Indiana 46567

Type of Action Taken: Changes that are administrative in nature

## **Notice of Decision: Approval**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <a href="http://www.in.gov/apps/idem/caats/">http://www.in.gov/apps/idem/caats/</a>
To view the document, choose Search Option **by Permit Number**, then enter permit 47937. This search will also provide the application received date and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: <a href="https://www.in.gov/idem">https://www.in.gov/idem</a> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

(continues on next page)



If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management Indiana Government Center North, Room 1207 100 North Senate Avenue Indianapolis, IN 46204 Phone: (317) 232-8667

Fax: (317) 233-6647

Email: IDEMFILEROOM@idem.in.gov

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, within eighteen (18) calendar days from the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Indiana Office of Administrative Law Proceedings (OALP)
- the date of the postmark on the envelope containing the document, if the document is mailed to OALP by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OALP by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Eric J. Holcomb

Governor

Brian C. Rockensuess

Commissioner

July 2, 2024

Mr. Dillon Grove Keystone Recreational Vehicle Company Plant 340 P. O. Box 2000 Goshen, IN 46527

Re: 039-47937-00748

Administrative Amendment to

MSOP Renewal No. 039-41790-00748

Dear Mr. Grove:

Keystone Recreational Vehicle Company Plant 340, formerly Keystone RV Company Plant 840, 844 & 845, was issued a Minor Source Operating Permit (MSOP) Renewal No. M039-41790-00748 on December 17, 2019 for a stationary recreational vehicle (RV) manufacturing facility located at 72440 State Road 13, Syracuse, Indiana 46567. On June 10, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to change the name of the source.

Pursuant to 326 IAC 2-6.1-6(d)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information concerning the source or emissions unit(s), where the revision will not trigger a new applicable requirement.

Pursuant to 326 IAC 2-6.1-6(d)(3), this change to the permit is considered an administrative amendment because the permit is amended to indicate a change in ownership or operational control of the source.

#### **Proposed Changes:**

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby amended as follows with the deleted language as strikeouts and new language **bolded**.

Pursuant to 326 IAC 2-6.1-6(d)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information concerning the source or emissions unit(s), where the revision will not trigger a new applicable requirement.

1. The company name has been revised throughout the permit as follows:

Company Name: Keystone RV Company Plant 840, 844 & 845
Keystone Recreational Vehicle Company Plant 340

2. Plant 840/844 has been revised throughout the permit as follows:

plant 840/844340

#### **Additional Changes:**

IDEM, OAQ has made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.





William

Permit Reviewer: Bruce Farrar

1. The company SIC code has been revised as follows:

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

SIC Code: 3792, 3711(Travel Trailers and Campers, Motor Vehicles and Car Bodies)

All other conditions of the permit shall remain unchanged and in effect.

Please find attached the entire MSOP as amended.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: https://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. 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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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

Sincerely,

Brian Williams, Section Chief

Permits Branch Office of Air Quality

Attachment(s): Updated Permit

CC: File - Elkhart County

Elkhart County Health Department

U.S. EPA, Region 5

Compliance and Enforcement Branch

IDEM Northern Regional Office



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Brian C. Rockensuess

Commissioner

## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

## Keystone Recreational Vehicle Company Plant 340 72440 State Road 13 Syracuse, Indiana 46567

(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.: M039-41790-00748

Master Agency Interest ID: 105875

Issued by: Original signed by:

Madhurima D. Moulik, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Issuance Date: December 17, 2019

Expiration Date: December 17, 2029

Minor Permit Revision No.: 039-46048-00748, issued on January 4, 2023.

Administrative Amendment No.: 039-47937-00748

Issued by:

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Issuance Date: July 2, 2024

Expiration Date: December 17, 2029



## **TABLE OF CONTENTS**

SECTION	N A	SOURCE SUMMARY4
	4.1 4.2	General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)] Emission Units and Pollution Control Equipment Summary
SECTION	NΒ	GENERAL CONDITIONS7
E E E E E E E E E E E E E E E E E E E	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.10 3.11 3.12 3.13 3.14 3.15	Definitions [326 IAC 2-1.1-1] Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)] Term of Conditions [326 IAC 2-1.1-9.5] Enforceability Severability Property Rights or Exclusive Privilege Duty to Provide Information Annual Notification [326 IAC 2-6.1-5(a)(5)] Preventive Maintenance Plan [326 IAC 1-6-3] Prior Permits Superseded [326 IAC 2-1.1-9.5] Termination of Right to Operate [326 IAC 2-6.1-7(a)] Permit Renewal [326 IAC 2-6.1-7] Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6] Source Modification Requirement 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] Transfer of Ownership or Operational Control [326 IAC 2-6.1-6] Annual Fee Payment [326 IAC 2-1.1-7] Credible Evidence [326 IAC 1-1-6]
SECTION	N C	SOURCE OPERATION CONDITIONS12
	Emissic C.1 C.2 C.3 C.4 C.5 C.6 C.7 C.8	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] Permit Revocation [326 IAC 2-1.1-9] Opacity [326 IAC 5-1] Open Burning [326 IAC 4-1][IC 13-17-9] Incineration [326 IAC 4-2][326 IAC 9-1-2] Fugitive Dust Emissions [326 IAC 6-4] Stack Height [326 IAC 1-7] Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
1		Requirements [326 IAC 2-6.1-5(a)(2)]
	Compli C.10	ance Requirements [326 IAC 2-1.1-11]
	<b>Compli</b> C.11 C.12	ance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
	<b>Correct</b> 0.13 0.14	tive Actions and Response Steps
(	<b>Record</b> C.15 C.16 C.17	Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

SECTION D	D.1 EMISSIONS UNIT OPERATION CONDITIONS	18
<b>Emi</b> D.1. D.1. D.1. D.1.	<ul> <li>Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]</li> <li>Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]</li> </ul>	18
<b>Con</b> D.1.	mpliance Determination Requirements	19
<b>Rec</b> D.1. D.1.	1 5 1	19
SECTION D	D.2 EMISSIONS UNIT OPERATION CONDITIONS	21
<b>Emi</b> D.2.	ission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	21
Con D.2.	mpliance Determination Requirements	21
SECTION D	D.3 EMISSIONS UNIT OPERATION CONDITIONS	22
<b>Emi</b> D.3. D.3. D.3.	.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]	22
	mpliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]	23
Rec D.3.	cord Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	23
SECTION D	D.4 EMISSIONS UNIT OPERATION CONDITIONS	24
<b>Emi</b> D.4.	ission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	24
Con D.4.	mpliance Determination Requirements	24
SECTION D	D.5 EMISSIONS UNIT OPERATION CONDITIONS	25
<b>Emi</b> D.5. D.5.	· · · · · · · · · · · · · · · · · · ·	25
Quarterly R	Report	26
ANNUAL N	OTIFICATION	27
MALFUNCT	TION REPORT	28

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Page 4 of 29 Syracuse, Indiana Amended by: Bruce Farrar M039-41790-00748

Permit Reviewer: Dylan Finley

#### **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 recreational vehicle (RV) manufacturing facility.

Source Address: 72440 State Road 13, Syracuse, Indiana 46567

General Source Phone Number: (574) 535-2145

SIC Code: 3792 (Travel Trailers and Campers)

County Location: Elkhart

Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program

Minor Source, under PSD 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) recreational vehicle assembly process located in plant 340, identified as AP-1, constructed in 2010, with a maximum capacity of 1.25 units per hour, exhausting indoors and consisting of the following emission units:
  - (1) (One) Lamination operation consisting of two (2) lamination lines.
  - (2) Adhesive rollers.
  - (3) Caulking guns.
  - (4) Five (5) welding stations, with a maximum rod consumption of 0.35 pounds per hour each, and exhausting into the indoors.
- (b) One (1) woodworking operation located in plant 340, identified as WW-1, constructed in 2010, with a maximum throughput of 120 pounds per hour, controlled by a baghouse, identified as DC-01, and exhausting indoors.
- (c) Three (3) natural gas-fired space heaters located in plant 340, identified as SH-01 through SH-03, constructed in 2010, with a maximum heat capacity of 0.48 MMBtu per hour each, and exhausting indoors.
- (d) One (1) surface coating operation located in plant 845, identified as AP-2, approved in 2019 for construction, with a maximum capacity of 1 unit per hour, and exhausting indoors.
- (e) One (1) woodworking operation located in plant 845, identified as WW-2, constructed in 2019, with a maximum throughput of 716 lbs/hr, exhausting indoors, and consisting of the following units
  - (1) Two (2) table saws;

- (2) Two (2) Chop Saws;
- (3) One (1) Radial Arm Saw;
- (4) One (1) Belt Sander;
- (5) One (1) Pin Router, controlled by a baghouse identified as WW-2DC1, exhausting indoors.
- (f) Two (2) natural gas-fired space heaters located in plant 845, identified as SH-04 and SH-05, constructed in 2019, with a total maximum heat capacity of 0.04 MMBtu/hr each, and exhausting indoors.
- (g) Three (3) natural gas-fired thermocyclers located in plant 845, identified as SH-06, SH-07, and SH-08, constructed in 2019, with a total maximum heat capacity of 0.83 MMBtu/hr each, and exhausting indoors.
- (h) One (1) miscellaneous cutting operation located in plant 845, identified as MC-1, constructed in 2019 and 2021, exhausting indoors and consisting of the following units:

Equipment	Unit ID	Maximum Capacity (lb/hr)
Three (3) chop saws	CS1, CS2, and CS3	200
One (1) table saw	TS1	100
Three (3) chop saws	CS4, CS5, CS6	200
Five (5) Chop Saws	CS7-CS11	325
Four (4) Chop Saws	CS12-CS15	200
Three (3) Chop Saws	CS16-CS18	200
Seven (7) Routers	RT1-RT7	200
Six (6) Hole Saws	HS1-HS6	200
One (1) Skill/Hand Saw	SKS1	100
Two (2) Drill Machines	DM1-DM2	100
One (1) Hole Saws	HS7	400
One (1) Router	RT8	400
Three (3) Grinders	GR1-GR3	400

(i) Paved roads.

#### Plant 340

- (j) One (1) touch up painting operation and one (1) paint gun cleaner, constructed in 2021using HVLP application method, using less than 5 gallons of coating materials per day, using no control and exhausting indoors;
- (k) One (1) sidewall and one (1) roof and floor routing operation; constructed in 2021, with maximum capacity of 2,700 pounds per hour, each, using no control and exhausting indoors;
- (I) Woodworking operation, identified as WW-1A and WW-1B, constructed in 2021, consisting of two (2) table saws with maximum capacity of 250 pounds per hour, each, using dust collectors as control, identified WW-1DC2 and WW-1DC3 and exhausting indoors;

(m) One (1) miscellaneous cutting operation, identified as MC-340, constructed in 2021, using no control, exhausting indoors and consisting of the following:

Equipment	Unit ID	Maximum Capacity (lb/hr)		
Twelve (12) Chop Saws	CS19-CS30	600		
One (1) Bandsaw	BDS1	100		
Nine (9) Routers	RT8-RT16	300		
Two (2) Drill Machines	DM3	50		
Fifteen (15) Hole Saws	HS7-HS21	500		
Five (5) Skill/Hand Saws	SKS2-SKS6	500		
One (1) Grinder	GR4	150		
Three (3) Chop Saws	CS31-CS33	150		
Eight (8) Chop Saws	CS34-CS41	400		
Thirteen (13) Hole Saws	HS22-HS34	650		
Two (2) Grinders	GR5-GR6	200		

- (n) Eight (8) aluminum welders, constructed in 2021, with a maximum electrode consumption of 24 pounds per day, each, using no control and exhausting indoors.
- (o) Two (2) natural gas fired space heaters, constructed in 2021, with a total maximum heat capacity of 0.48 MMBtu/hr, each, and exhausting indoors.

#### Plant 845

- (p) One (1) touch up painting operation and one (1) paint gun cleaner, constructed in 2021 using HVLP application method, using less than 5 gallons of coating materials per day, using no control and exhausting indoors;
- (q) One (1) table saw, constructed in 2021, identified as WW-2A, with a maximum capacity of 250 pounds per hour, controlled by dust collector, identified as WW-2DC2 and exhausting indoors;

### PDI (Pre-Delivery Inspection) Plant

- (r) Two (2) natural gas fired space heaters, constructed in 2021, with a total maximum heat capacity of 0.25 MMBtu/hr each, and exhausting indoors;
- (s) One (1) 300 gallon capacity diesel fuel storage tank.

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Page 7 of 29 Syracuse, Indiana Amended by: Bruce Farrar M039-41790-00748

Permit Reviewer: Dylan Finley

#### **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, M039-41790-00748, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

#### B.4 Enforceability

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

#### B.5 Severability

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

#### B.6 Property Rights or Exclusive Privilege

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

#### B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### **B.8** Annual Notification [326 IAC 2-6.1-5(a)(5)]

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.

Page 8 of 29

The annual notice shall be submitted in the format attached no later than March 1 of each (b) 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 Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - Identification of the individual(s) responsible for inspecting, maintaining, and (1) repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 M039-41790-00748 Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

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

The Permittee shall implement the PMPs.

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

Page 9 of 29

To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation (d) 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]

- All terms and conditions of permits established prior to M039-41790-00748 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]

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

Page 10 of 29 M039-41790-00748

- (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

Page 11 of 29 M039-41790-00748

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

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

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

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

Page 12 of 29

#### 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.
- Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit. (b)
- Changes in regulatory requirements that mandate either a temporary or permanent (c) 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.
- For any cause which establishes in the judgment of IDEM, the fact that continuance of (e) 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.
- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (b) (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).

Page 13 of 29

#### C.7 Stack Height [326 IAC 1-7]

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

#### C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

- 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.
- The Permittee shall ensure that a written notification is sent on a form provided by the (b) 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.
- The Permittee shall ensure that the notice is postmarked or delivered according to the (c) guidelines set forth in 326 IAC 14-10-3(2).
- The notice to be submitted shall include the information enumerated in 326 IAC 14-10-(d) 3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748
Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

Page 14 of 29 M039-41790-00748

applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector

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

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

#### C.9 Performance Testing [326 IAC 3-6]

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

#### C.12 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748
Syracuse, Indiana Amended by: Bruce Farrar M

Permit Reviewer: Dylan Finley

Page 15 of 29 M039-41790-00748

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

#### **Corrective Actions and Response Steps**

#### C.13 Response to Excursions or Exceedances

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

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

#### C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

Page 16 of 29 M039-41790-00748

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

#### C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### C.17 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748
Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

Page 17 of 29 M039-41790-00748

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

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

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (a) One (1) recreational vehicle assembly process located in plant 340, identified as AP-1, constructed in 2010, with a maximum capacity of 1.25 units per hour, exhausting indoors and consisting of the following emission units:
  - (1) (One) Lamination operation consisting of two (2) lamination lines.
  - (2) Adhesive rollers.
  - (3) Caulking guns.
  - (4) Five (5) welding stations, with a maximum rod consumption of 0.35 pounds per hour each, and exhausting into the 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 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the total input of VOC, including solvents, coatings, and adhesives, delivered to the assembly process (AP-1), when not applying coating to wood furniture subject to 326 IAC 8-2-12 or miscellaneous metal parts subject to 326 IAC 8-2-9, shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the assembly operation (AP-01) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

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

- Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), when coating metal parts, the volatile organic compound (VOC) content of the coating delivered to the assembly process (AP-1) shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds per gallon of coating, excluding water, as delivered to the applicator.
- (b) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Syracuse, Indiana Amended by: Bruce Farrar M039-41790-00748

Permit Reviewer: Dylan Finley

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

Page 19 of 29

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

#### D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the assembly process (AP-1), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless Spray Application Air Assisted Airless Spray Application **Electrostatic Spray Application** Electrostatic Bell or Disc Application Heated Airless Spray Application Roller Coating Brush or Wipe Application Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between onetenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the assembly process, woodworking operation, and any 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**

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

Compliance with the VOC input limitations contained in Condition D.1.1 and D.1.2(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, IDEM, OAQ. reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### Record Keeping Requirements D.1.6

- To document compliance with Conditions D.1.1, D.1.2(a) and D.1.5, 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 input established in Conditions D.1.1, D.1.2(a), and D.1.5.
  - (1) The VOC content of each coating material and solvent used less water.
  - The amount of coating material and solvent used on a monthly basis. (2)

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748
Syracuse, Indiana Amended by: Bruce Farrar M039

Permit Reviewer: Dylan Finley

Page 20 of 29 M039-41790-00748

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The monthly cleanup solvent usage;
- (4) The total VOC input for each month and each compliance period for surface coating of products not considered wood furniture subject to 326 IAC 8-2-12 or miscellaneous metal parts subject to 326 IAC 8-2-9.
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations 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 no regard to the reporting required by this condition.

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

(b) One (1) woodworking operation, identified as WW-1, constructed in 2010, with a maximum throughput of 120 pounds per hour, controlled by a baghouse, identified as DC-01, and exhausting to stack DC-01.

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

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

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

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

### **Compliance Determination Requirements**

#### D.2.2 Particulate Control

In order to ensure that the woodworking operation (WW-1) is exempt from the requirements of 326 IAC 6-3-2, the baghouse (DC-01) for particulate control shall be in operation and controlling emissions from the woodworking operation (WW-1) at all times the units are in operation.

#### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

(d) One (1) surface coating operation located in plant 845, identified as AP-2, approved in 2019 for construction, with a maximum capacity of 1 unit per hour, 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.3.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), when coating metal parts, the volatile organic compound (VOC) content of the coating delivered to the assembly process (AP-2) shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds per gallon of coating, excluding water, as delivered to the applicator.
- (b) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) Minimize VOC emissions from the cleaning 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.3.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the assembly process (AP-2), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Syracuse, Indiana Amended by: Bruce Farrar M039-41790-00748

Permit Reviewer: Dylan Finley

Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between onetenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Page 23 of 29

#### Preventive Maintenance Plan [326 IAC 1-6-3] D.3.3

A Preventive Maintenance Plan is required for the assembly process, woodworking operation, and any 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)]

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

Compliance with the VOC input limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### Record Keeping Requirements D.3.5

- To document compliance with Conditions D.3.1(a) and D.3.4, 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 input established in Conditions D.3.1(a), and D.3.4.
  - The VOC content of each coating material and solvent used less water. (1)
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) The monthly cleanup solvent usage;
  - (4) The total VOC input for each month and each compliance period for surface coating of products not considered wood furniture subject to 326 IAC 8-2-12 or miscellaneous metal parts subject to 326 IAC 8-2-9.
- Section C General Record Keeping Requirements contains the Permittee's obligations (b) with regard to the records required by this condition

#### SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (e) One (1) woodworking operation located in plant 845, identified as WW-2, constructed in 2019, with a maximum throughput of 716 lbs/hr, exhausting indoors, and consisting of the following units
  - (1) Two (2) table saws;
  - (2) Two (2) Chop Saws;
  - (3) One (1) Radial Arm Saw;
  - (4) One (1) Belt Sander;
  - (5) One (1) Pin Router, controlled by a baghouse identified as WW-2DC1, 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.4.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.4.2 Particulate Control

In order to ensure that the woodworking operation (WW-2) is exempt from the requirements of 326 IAC 6-3-2, the baghouses for particulate control shall be in operation and controlling emissions from the woodworking operation (WW-2) at all times the associated units are in operation.

#### SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:** 

Plant 340

(k) One (1) sidewall and one (1) roof and floor routing operation; constructed in 2021, with maximum capacity of 2,700 pounds per hour, each, using no 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.5.1 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the routing operation shall not exceed 7.98 pounds per hour when operating at a process weight rate of 2.7 tons per hour.

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

 $E = 4.10 P^{0.67}$ 

Where:

E = rate of emission in pounds per hour P = process weight rate in tons per hour

#### D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

Page 26 of 29 M039-41790-00748

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

## **Quarterly Report**

So M Fa Pa	ource Name: ource Address SOP Permit N acility: arameter: mit:	72440 State Road  O.: M039-41790-0074  Assembly Procest VOC Input The total input of delivered to the asfurniture subject to 326 IAC 8-2-9, sh		ngs, and adhesives, not applying coating to wood cous metal parts subject to elve (12) consecutive month
	QUART	ER:	YEAR:	
Ī		Column 1	Column 2	Column 1 + Column 2
	Month	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
<u> </u>		• •		

Phone:

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

Page 27 of 29 M039-41790-00748

## 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:	Company Name: Keystone Recreational Vehicle Company Plant 340					
Source Address:	Source Address: 72440 State Road 13					
City:	Syracuse, Indiana 46567					
Phone #:	(574) 535-2145					
MSOP #:	M039-41790-00748					
I hereby certify that Keys 340 is:	stone Recreational Vehicle Company Plant					
I hereby certify that Keys is:	□ no longer in operation.  In a longer in operation.  In compliance with the requirements of MSOP M039-41790-00748.  In a longer in operation.  MSOP M039-41790-00748.  In a longer in operation.  In a longer in					
Authorized Individual	(typed):					
Title:						
Signature:						
Date:						
lescription of how the sound	s or requirements for which the source is not in compliance, provide a narrative urce did or will achieve compliance and the date compliance was, or will be					
Noncompliance:						

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 M039-41790-00748 Syracuse, Indiana Amended by: Bruce Farrar

Permit Reviewer: Dylan Finley

\*SEE PAGE 2

#### **MALFUNCTION REPORT**

Page 28 of 29

#### 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 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 3.5 TONS/YEAR AND COMPOUNDS MEASURED AS ELEMENTAL LEAD. 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 THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y COMPANY: LOCATION: (CITY AND COUNTY) PERMIT NO CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: DATE/TIME MALFUNCTION STARTED: \_\_\_\_/ 20\_\_\_\_ 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 <u>ESSENTIAL</u>\* 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:

Keystone Recreational Vehicle Company Plant 340 Administrative Amendment No.: 039-47937-00748 Page 29 of 29 Syracuse, Indiana Amended by: Bruce Farrar M039-41790-00748

Permit Reviewer: Dylan Finley

# 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

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb

Brian C. Rockensuess

Commissioner

#### SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Dillon Grove

Keystone Recreational Vehicle Company Plant 340

PO Box 2000 Goshen, IN 46527

DATE: July 2, 2024

FROM: Jenny Acker, Branch Chief

Permits Branch
Office of Air Quality

SUBJECT: Final Decision

MSOP Administrative Amendment

039-47937-00748

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

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. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

**IDEM's online searchable database:** <a href="http://www.in.gov/apps/idem/caats/">http://www.in.gov/apps/idem/caats/</a>. Choose Search Option **by Permit Number**, then enter permit 47937

and

**IDEM's Virtual File Cabinet (VFC):** <a href="https://www.in.gov/idem">https://www.in.gov/idem</a>. 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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at <a href="mailto:jbrush@idem.IN.gov">jbrush@idem.IN.gov</a>.

Final Applicant Cover Letter 8/20/20-acces via website





### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb

Governor

Brian C. Rockensuess

Commissioner

## July 2, 2024 Keystone Recreational Vehicle Company Plant 340 039-47937-00748

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: <a href="http://www.in.gov/apps/idem/caats/">http://www.in.gov/apps/idem/caats/</a>. Choose Search Option by Permit Number, then enter permit 47937

and

IDEM's Virtual File Cabinet (VFC): <a href="https://www.in.gov/idem">https://www.in.gov/idem</a>. 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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: If you 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 Final Interested Parties Cover Letter 10/13/2023



## Mail Code 61-53

IDEM Staff	LGAINES 7/2/20	024		
	Keystone Recrea	tional Vehicle Company Plant 340 039-47	AFFIX STAMP	
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											Remarks
1		Dillon Grove Keystone Recreational Vehicle Company Plant 340 PO Box 2000 Gosher	ı IN 46527 (S	Source CAATS	S) via EMS						
2		David Thomas Vice President of Operations Keystone Recreational Vehicle Company	Plant 340 P	O Box 2000 G	oshen IN 46527 (R	O CAATS)					
3		Elkhart City Council and Mayors Office 229 S Second St Elkhart IN 46516 (Local Office 229 S Second St Elkhart IN 46516)	ficial)								
4		Elkhart County Health Department 608 Oakland Ave Elkhart IN 46516 (Health Depa	rtment)								
5		Syracuse Town Council and Town Manager 310 N Huntington St Syracuse IN 46567	(Local Office	cial)							
6		Mr. Kevin Parks D & B Environmental Services Inc 401 Lincoln Way W Osceola IN 46561 (Consultant)									
7		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)									
8		Mr. Roger Schneider The Goshen News 114 S Main St Goshen IN 46526 (Affected Party)									
9		Nibco, Inc. 701 Eisenhower Drive Goshen IN 46526 (Affected Party)									
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