NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Source Operating Permit (MSOP)

for Lippert Components, Inc. in Elkhart County

MSOP No.: M 039-42092-00764

The Indiana Department of Environmental Management (IDEM) has received an application from Lippert Components, Inc., located at 2602 College Ave., Goshen, Indiana 46528, for a MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Lippert Components, Inc. to continue to operate its existing source. Lippert Components, Inc. has applied to request the transition from the existing SSOA to a MSOP due to the production increase.

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

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

Goshen Public Library
601 S 5th Street
Goshen, IN 46526

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing,
IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 039-42092-00764 in all correspondence.

Comments should be sent to:

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

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

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

What will happen after IDEM makes a decision?

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

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

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
Minor Source Operating Permit
OFFICE OF AIR QUALITY

Lippert Components, Inc.
2602 College Ave.
Goshen, Indiana 46528

(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.

<table>
<thead>
<tr>
<th>Operation Permit No.</th>
<th>Master Agency Interest ID:</th>
</tr>
</thead>
<tbody>
<tr>
<td>M039-42092-00764</td>
<td>30474</td>
</tr>
</tbody>
</table>

**Issued by:**
Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

**Issue Date:**

**Expiration Date:**
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SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary woodworking and furniture components plant.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>2602 College Ave., Goshen, Indiana 46528</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 238-5793</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2512 (Wood Household Furniture, Upholstered)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Minor Source Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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) woodworking operation, constructed in 2012, with a maximum capacity of 6,886 pounds of wood per hour, using an integral baghouse, identified as BH1, providing particulate control and exhausting indoors, consisting of the following emission units:

(1) Two (2) CNC routers, identified as EU2 and EU3, each with a maximum capacity of 936 pounds of wood per hour;

(2) Two (2) opticut saws, identified as EU4 and EU5, each with a maximum capacity of 1,198 pounds of wood per hour;

(3) Two (2) gang rip saws, identified as EU6 and EU7, each with a maximum capacity of 1,198 pounds of wood per hour;

(4) One (1) chop saw, identified as EU8, with a maximum capacity of 34 pounds of wood per hour;

(5) Three (3) table saws, identified as EU9 through EU11, each with a maximum capacity of 44 pounds of wood per hour; and

(6) One (1) wood scrap grinder, identified as EU12, with a maximum capacity of 391 pounds of wood per hour.

(b) One (1) adhesive application process utilizing HVLP method, identified as EU1, constructed in 2014, with a maximum production rate of 50 units per hour, and with a maximum capacity of 16.59 lbs adhesive per hour applied on wood substrate.
(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Thirty five (35) indirect natural gas-fired combustion units, identified as NG1 through NG35, constructed in 2012, with a maximum heat input capacity range from 0.72 to 8.625 million Btu per hour (MMBtu/ hr), and total maximum heat input capacity of 64.53 million Btu per hour (MMBtu/hr), utilizing no control, exhausting outdoors.

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

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

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

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

(a) This permit, M039-42092-00764, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

(a) All terms and conditions of permits established prior to M039-42092-00764 and issued pursuant to permitting programs approved into the state implementation plan have been either:

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

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

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

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

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

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

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

(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.

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 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]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.
(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

C.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 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 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

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

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

Emissions Unit Description:

(b) One (1) adhesive application process utilizing HVLP method, identified as EU1, constructed in 2014, with a maximum production rate of 50 units per hour, and with a maximum capacity of 16.59 lbs of adhesive per hour applied on wood substrate.

(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 Wood Furniture and Cabinet Coating  [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating materials applied to the wood furniture, cabinets and wood furniture components shall all be applied, 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 methods:

- 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 one-tenth (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.

D.1.2 Preventive Maintenance Plan  [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Thirty five (35) indirect natural gas-fired combustion units, identified as NG1 through NG35, constructed in 2012, with a maximum heat input capacity range from 0.72 to 8.625 million Btu per hour (MMBtu/hr), and total maximum heat input capacity of 64.53 million Btu per hour (MMBtu/hr), utilizing no control, exhausting outdoors.

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

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of the indirect fired combustion units, identified as NG1 through NG35 shall not exceed 0.36 pounds per MMBtu heat input.

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

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) woodworking operation, constructed in 2012, with a maximum capacity of 6,886 pounds of wood per hour, using an integral baghouse, identified as BH1, providing particulate control and exhausting indoors, consisting of the following emission units:

(1) Two (2) CNC routers, identified as EU2 and EU3, each with a maximum capacity of 936 pounds of wood per hour;

(2) Two (2) opticut saws, identified as EU4 and EU5, each with a maximum capacity of 1,198 pounds of wood per hour;

(3) Two (2) gang rip saws, identified as EU6 and EU7, each with a maximum capacity of 1,198 pounds of wood per hour;

(4) One (1) chop saw, identified as EU8, with a maximum capacity of 34 pounds of wood per hour;

(5) Three (3) table saws, identified as EU9 through EU11, each with a maximum capacity of 44 pounds of wood per hour; and

(6) One (1) wood scrap grinder, identified as EU12, with a maximum capacity of 391 pounds of wood per hour.

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the woodworking operations shall not exceed 9.08 pounds per hour when operating at a process weight rate of 3.27 tons per hour (7,221 pounds per hour).

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

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

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and \( P \) = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.3.3 Baghouse Inspections

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

D.3.4 Particulate Control

In order to ensure compliance with Condition D.3.1, the baghouse for particulate control shall be in operation and control emissions from the woodworking operations facility at all times the woodworking operations facility is in operation.

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

D.3.5 Broken or Failed Bag Detection - Baghouse

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

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

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

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(a)(2)] [326 IAC 2-6.1-5(1)(2)]

D.3.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.3, the Permittee shall maintain records of the results of the inspections required under Condition D.3.3.

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

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Lippert Components, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>2602 College Ave.</td>
</tr>
<tr>
<td>City:</td>
<td>Goshen, Indiana  46528</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(574) 238-5793</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M039-42092-00764</td>
</tr>
</tbody>
</table>

I hereby certify that Lippert Components, Inc. is:  
☐ still in operation.  
☐ no longer in operation.  

I hereby certify that Lippert Components, Inc. is:  
☐ in compliance with the requirements of MSOP M039-42092-00764.  
☐ not in compliance with the requirements of MSOP M039-42092-00764.

Authorized Individual (typed):  

Title:  

Signature:  

Date:  

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

<table>
<thead>
<tr>
<th>Noncompliance:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.


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

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

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

COMPANY:_________________________________________________________ PHONE NO. (      )___________________
LOCATION: (CITY AND COUNTY)_________________________________________________________________________
PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:__________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:________________________________________
__________________________________________________________________________________________________
DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____    _________________________________________ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/______/ 20____   _______________ AM/PM

TYPE OF POLLUTANTS EMITTED:   TSP,  PM-10,  SO2,  VOC,  OTHER:________________________________________
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _______________________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS:____________________________________________________________
___________________________________________________________________________________________________
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:
INTERIM CONTROL MEASURES: (IF APPLICABLE)
___________________________________________________________________________________________________

MALFUNCTION REPORTED BY:__________________________________TITLE:___________________________
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY:_______________________DATE:__________________TIME:__________________
*SEE PAGE 2
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:

________________________________________________________________________
________________________________________________________________________
Source Description and Location

Source Name: Lippert Components, Inc.
Source Location: 2602 College Ave., Goshen, IN 46258
County: Elkhart
SIC Code: 2512 (Wood Household Furniture, Upholstered)
Operation Permit No.: M 039-42092-00764
Permit Reviewer: Daria Antipova

On October 18, 2019, the Office of Air Quality (OAQ) received an application from Lippert Components, Inc. related to the transition of the stationary woodworking and furniture components plant from a SSOA to a MSOP.

Existing Approvals

The source has been operating under SSOA No. S039-34992-00764, issued on October 23, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) PM$_{2.5}$
Elkhart County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Fugitive Emissions**

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

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

**Greenhouse Gas (GHG) Emissions**

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lippert Components, Inc. on October 18, 2019, relating to an increase to the maximum production capacity, and an adhesive application operation, which was previously exempt from the permit, now added to this operating permit. The changes resulted in a transition from a SSOA to a MSOP.

(a) One (1) woodworking operation, constructed in 2012, with a maximum capacity of 6,886 pounds of wood per hour, using an integral baghouse, identified as BH1, for particulate control and exhausting indoors, consisting of the following emission units:

(1) Two (2) CNC routers, identified as EU2 and EU3, each with a maximum capacity of 936 pounds of wood per hour;

(2) Two (2) opticut saws, identified as EU4 and EU5, each with a maximum capacity of 1,198 pounds of wood per hour;
(3) Two (2) gang rip saws, identified as EU6 and EU7, each with a maximum capacity of 1,198 pounds of wood per hour;

(4) One (1) chop saw, identified as EU8, with a maximum capacity of 34 pounds of wood per hour;

(5) Three (3) table saws, identified as EU9 through EU11, each with a maximum capacity of 44 pounds of wood per hour; and

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(b) One (1) adhesive application process utilizing HVLP method, identified as EU1, constructed in 2014, with a maximum production rate of 50 units per hour, and with a maximum capacity of 16.59 lbs adhesive per hour applied on wood substrate.

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Thirty five (35) indirect natural gas-fired combustion units, identified as NG1 through NG35, constructed in 2012, with a maximum heat input capacity range from 0.72 to 8.625 million Btu per hour (MMBtu/hr), and total maximum heat input capacity of 64.53 million Btu per hour (MMBtu/hr), utilizing no control, exhausting outdoors.

(d) Paved and unpaved roads and parking lots with public access.

---

**“Integral Part of the Process” Determination**

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

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**Enforcement Issues**

There are no pending enforcement actions related to this source.

---

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.
Permit Level Determination – MSOP

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

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adhesive</td>
<td>7.77</td>
<td>7.77</td>
<td>7.77</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodworking</td>
<td>4.81</td>
<td>4.81</td>
<td>4.81</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NG Combustions</td>
<td>0.53</td>
<td>2.11</td>
<td>2.11</td>
<td>0.17</td>
<td>27.71</td>
<td>1.52</td>
<td></td>
<td>23.28</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitives</strong>*</td>
<td>13.10</td>
<td>14.68</td>
<td>14.68</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.52</td>
</tr>
<tr>
<td>Fugitive Emissions (Unpaved Roads)</td>
<td>0.18</td>
<td>0.05</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fugitive Emissions (Paved Roads)</td>
<td>8.09</td>
<td>1.62</td>
<td>0.40</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives</strong>*</td>
<td>21.38</td>
<td>16.35</td>
<td>15.09</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.52</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>100</td>
<td>25</td>
</tr>
</tbody>
</table>

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

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

(a) The potential to emit (as defined in 326 IAC 2-1.1-1) of NOx and VOC are each less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

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

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

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

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63.800, Subpart JJ and 326 IAC 20-14, are not included for this operating permit because the source is not a major source of HAP emissions.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, because the source will not perform spray application using coatings containing the target HAP as defined in 40 CFR 63.11180 in coating woodworking and furniture components. Pursuant to 40 CFR 63.11180 Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

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

Compliance Assurance Monitoring (CAM):

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

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>State rule applicability for this source has been reviewed as follows:</td>
</tr>
</tbody>
</table>

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

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

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

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

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

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads and parking lots have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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

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

State Rule Applicability – Individual Facilities

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

Adhesive Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
IDEM, OAQ has determined that adhesive application at this source, when using non-atomizing HVLP spray guns and aerosol cans, does not have the potential to emit particulate emissions. This adhesive is applied as a sticky, stretchy, stringy, web-like material. Therefore, this adhesive operation does not meet the definition of "surface coating" under 326 IAC 6-3-1.5(5) and is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-2-12 (Wood Furniture and Cabinet coating)
Pursuant to 326 IAC 8-2-1(a)(4), the adhesive applications are subject to the requirements of 326 IAC 8-2-12 because it was constructed after July 1, 1990 and have potential emissions greater than fifteen (15) pounds per day of VOC.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1, the adhesive applications are not subject to the requirements of 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-12. Therefore, the requirements of 326 IAC 8-1-6 does not apply.

326 IAC 8-22 (Miscellaneous Industrial Adhesives)
The adhesive application has actual VOC emissions of greater than three (3) tons per twelve (12) month period; however, this facility is not located in Lake or Porter County. Therefore, the requirements of 326 IAC 8-22 do not apply.
Woodworking Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate emissions from the woodworking operations shall not exceed 9.08 pounds per hour when operating at a process weight rate of 3.27 tons per hour (7,221 pounds per hour).

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

\[ E = 4.10 \ P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and
\( P \) = process weight rate in tons per hour

The baghouse, identified as BH1, shall be in operation at all times the woodworking facility is in operation, in order to ensure the woodworking operations is in compliance with the limit under 326 IAC 6-3-2.

Natural Gas Combustion Sources

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

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

\[ Pt = \frac{1.09}{Q^{0.26}} \]

Where:

\( Pt \) = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).
\( Q \) = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

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

<table>
<thead>
<tr>
<th>Indirect Heating Units Which Began Operation After September 21, 1983</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility</td>
</tr>
<tr>
<td>Thirty five (35) Natural gas-fired heaters, identified as NG1 through NG35</td>
</tr>
</tbody>
</table>

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations: Applicability)
The requirements of 326 IAC 7-1.1 are not applicable to this source because the natural gas-fired heaters have potential emissions less than twenty-five (25) tons per year and actual emissions of less than ten (10) pounds per hour.
326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the facility, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

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

### Compliance Determination and Monitoring Requirements

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

In order to ensure compliance with 326 IAC 6-3-2, the baghouse for particulate control, identified as BH1, shall be in operation and control emissions from the woodworking operations facility at all times the woodworking operations facility is in operation.

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

<table>
<thead>
<tr>
<th>Control Device/Process</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghouse BH1/</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
<tr>
<td>Woodworking Operation</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouse for the woodworking operations must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 18, 2019.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-42092-00764. The staff recommends to the Commissioner that the MSOP be approved.

### IDEM Contact

(a) If you have any questions regarding this permit, please contact Daria Antipova, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-3429 or (800) 451-6027, and ask for Daria Antipova or (317) 234-3429.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
### Uncontrolled Potential to Emit (tons/yr)*

<table>
<thead>
<tr>
<th>Emission Unit/ Process</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Worst Case Single HAP (Hexane)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adhesive</td>
<td>7.77</td>
<td>7.77</td>
<td>7.77</td>
<td>-</td>
<td>-</td>
<td>37.72</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Woodworking</td>
<td>83.91</td>
<td>83.91</td>
<td>83.91</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>NG Combustions</td>
<td>0.53</td>
<td>2.11</td>
<td>2.11</td>
<td>0.17</td>
<td>27.71</td>
<td>1.52</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
<tr>
<td><strong>Source Total Excluding Fugitives</strong></td>
<td>92.21</td>
<td>93.79</td>
<td>93.79</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
<tr>
<td>Fugitive Emissions (Unpaved Roads)</td>
<td>0.18</td>
<td>0.05</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions (Paved Roads)</td>
<td>8.09</td>
<td>1.62</td>
<td>0.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Source Total Including Fugitives</strong></td>
<td>100.48</td>
<td>95.45</td>
<td>94.19</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
</tbody>
</table>

*PTE for the woodworking operation is listed prior Integral Baghouse.

### Potential to Emit After Issuance (tons/yr)**

<table>
<thead>
<tr>
<th>Emission Unit/ Process</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Worst Case Single HAP (Hexane)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adhesive</td>
<td>7.77</td>
<td>7.77</td>
<td>7.77</td>
<td>-</td>
<td>-</td>
<td>37.72</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Woodworking</td>
<td>4.81</td>
<td>4.81</td>
<td>4.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>0.53</td>
<td>2.11</td>
<td>2.11</td>
<td>0.17</td>
<td>27.71</td>
<td>1.52</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
<tr>
<td><strong>Source Total Excluding Fugitives</strong></td>
<td>13.10</td>
<td>14.68</td>
<td>14.68</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
<tr>
<td>Fugitive Emissions (Unpaved Roads)</td>
<td>0.18</td>
<td>0.05</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions (Paved Roads)</td>
<td>8.09</td>
<td>1.62</td>
<td>0.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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</tr>
<tr>
<td><strong>Source Total Including Fugitives</strong></td>
<td>21.38</td>
<td>16.35</td>
<td>15.09</td>
<td>0.17</td>
<td>27.71</td>
<td>39.24</td>
<td>23.28</td>
<td>0.50</td>
<td>0.52</td>
</tr>
</tbody>
</table>

**The potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
### Emissions Calculations
#### Adhesive Application

**Company Name:** Lippert Components, Inc.

**Source Address:** 2602 College Ave., Goshen, IN 46528

**Permit Number:** M039-42092-00764

**Permit Reviewer:** Daria Antipova

#### Process Rates

<table>
<thead>
<tr>
<th>Process Rates</th>
<th>Cylinders (Production)</th>
<th>Aerosol Cans (Touch Up)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Usage Rate</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>36</td>
<td>3,672</td>
</tr>
<tr>
<td></td>
<td></td>
<td>cylinder used from 8/21 - 11/5/2018</td>
</tr>
<tr>
<td></td>
<td>56</td>
<td>56</td>
</tr>
<tr>
<td></td>
<td></td>
<td>days between 8/21 - 11/5/2018</td>
</tr>
<tr>
<td></td>
<td>0.64</td>
<td>65.57</td>
</tr>
<tr>
<td></td>
<td></td>
<td>cylinders used per day</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>hours adhesive sprayed per day</td>
</tr>
<tr>
<td></td>
<td>0.08</td>
<td>8.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td>cylinders used per hour</td>
</tr>
<tr>
<td><strong>Maximum Production Rate</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>66,666</td>
<td>66,666</td>
</tr>
<tr>
<td></td>
<td>56</td>
<td>56</td>
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<tr>
<td></td>
<td></td>
<td>days between 8/21 - 11/5/2018</td>
</tr>
<tr>
<td></td>
<td>1,190</td>
<td>1,190</td>
</tr>
<tr>
<td></td>
<td>24</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td></td>
<td>hours units produced per day</td>
</tr>
<tr>
<td></td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td></td>
<td>units produced per hour</td>
</tr>
<tr>
<td><strong>Adhesive Application Rate</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>130</td>
<td>0.75</td>
</tr>
<tr>
<td></td>
<td></td>
<td>lbs adhesive per cylinder (per supplier)</td>
</tr>
<tr>
<td></td>
<td>10.45</td>
<td>6.15</td>
</tr>
<tr>
<td></td>
<td></td>
<td>lbs adhesive used per hour</td>
</tr>
<tr>
<td></td>
<td>0.21</td>
<td>0.12</td>
</tr>
<tr>
<td></td>
<td></td>
<td>lbs adhesive per unit</td>
</tr>
<tr>
<td></td>
<td>0.80</td>
<td>0.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>specific gravity of adhesive</td>
</tr>
<tr>
<td></td>
<td>6.68</td>
<td>5.01</td>
</tr>
<tr>
<td></td>
<td></td>
<td>lbs/gallon density of adhesive</td>
</tr>
<tr>
<td></td>
<td>1.56</td>
<td>1.23</td>
</tr>
<tr>
<td></td>
<td></td>
<td>gallons adhesive used per hour</td>
</tr>
<tr>
<td></td>
<td>0.032</td>
<td>0.025</td>
</tr>
<tr>
<td></td>
<td></td>
<td>gallons adhesive per unit</td>
</tr>
</tbody>
</table>

#### Emissions Calculations Table

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Volatile Content (%)</th>
<th>VOC Content (%)</th>
<th>Solids Content (%)</th>
<th>Maximum Material Usage (lbs/unit)</th>
<th>Maximum Throughput (units/hour)</th>
<th>Potential VOC Emissions (lbs/hour)</th>
<th>Transfer Efficiency (%)</th>
<th>Potential PM Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Premium Adhesive C7846</td>
<td>6.68</td>
<td>0.74</td>
<td>0.51</td>
<td>0.27</td>
<td>0.21</td>
<td>50</td>
<td>5.33</td>
<td>23.34</td>
<td>65%</td>
</tr>
<tr>
<td>Spray Rite SR12HF Aerosol Can</td>
<td>5.01</td>
<td>---</td>
<td>0.53</td>
<td>0.26</td>
<td>0.12</td>
<td>50</td>
<td>3.28</td>
<td>14.38</td>
<td>50%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>8.61</td>
<td>37.72</td>
<td></td>
</tr>
</tbody>
</table>
## Emissions Calculations

**Particulate Emissions from Woodworking Operation**

**Company Name:** Lippert Components, Inc.

**Source Address:** 2602 College Ave., Goshen, IN 46528

**Permit Number:** M039-42092-00764

**Permit Reviewer:** Daria Antipova

### Process Capacity

<table>
<thead>
<tr>
<th>Equipment Name</th>
<th>Emission Unit ID</th>
<th>Process Capacity (lbs/hr)</th>
<th>Potential PM Emissions*(lbs/hour)</th>
<th>Baghouse Outlet Conc. (tons/year)</th>
<th>Baghouse Airflow (grains/dscf)</th>
<th>Controlled Potential PM Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CNC Router 1</td>
<td>EU2</td>
<td>936</td>
<td>2.47</td>
<td>10.80</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CNC Router 2</td>
<td>EU3</td>
<td>936</td>
<td>2.47</td>
<td>10.80</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Opticut 1</td>
<td>EU4</td>
<td>1,198</td>
<td>2.91</td>
<td>12.74</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Opticut 2</td>
<td>EU5</td>
<td>1,198</td>
<td>2.91</td>
<td>12.74</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gang Rip Saw 1</td>
<td>EU6</td>
<td>1,198</td>
<td>2.91</td>
<td>12.74</td>
<td>0.004</td>
<td>32,000</td>
</tr>
<tr>
<td>Gang Rip Saw 2</td>
<td>EU7</td>
<td>1,198</td>
<td>2.91</td>
<td>12.74</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chop Saw</td>
<td>EU8</td>
<td>34</td>
<td>0.27</td>
<td>1.17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Table Saw 1</td>
<td>EU9</td>
<td>44</td>
<td>0.32</td>
<td>1.39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Table Saw 2</td>
<td>EU10</td>
<td>44</td>
<td>0.32</td>
<td>1.39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Table Saw 3</td>
<td>EU11</td>
<td>44</td>
<td>0.32</td>
<td>1.39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood Scrap Grinder</td>
<td>EU12</td>
<td>391</td>
<td>1.37</td>
<td>6.02</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>7,221</strong></td>
<td><strong>19.16</strong></td>
<td><strong>83.91</strong></td>
<td><strong>1.10</strong></td>
<td><strong>4.81</strong></td>
</tr>
</tbody>
</table>

*PM emissions based on IAC 326 6-3-2(e) process weight rate allowable emission equation: \[ E = 4.10 \times P^{0.67} \]
### Appendix A: Emissions Calculations

#### Natural Gas Combustion Only

**MM BTU/HR <100**

**Company Name:** Lippert Components, Inc.

**Source Address:** 2602 College Ave., Goshen, IN 46528

**Permit Number:** M039-42092-00764

**Permit Reviewer:** Daria Antipova

<table>
<thead>
<tr>
<th>Unit Description</th>
<th>Unit ID</th>
<th>Number of Units</th>
<th>Unit Capacity (MMBtu/hr)</th>
<th>Total Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTU</td>
<td>NG1-NG8</td>
<td>8</td>
<td>0.224</td>
<td>1.79</td>
</tr>
<tr>
<td></td>
<td>NG14, NG17, NG19</td>
<td>3</td>
<td>0.180</td>
<td>0.54</td>
</tr>
<tr>
<td></td>
<td>NG13</td>
<td>1</td>
<td>0.172</td>
<td>0.17</td>
</tr>
<tr>
<td></td>
<td>NG9</td>
<td>1</td>
<td>0.160</td>
<td>0.16</td>
</tr>
<tr>
<td></td>
<td>NG15</td>
<td>2</td>
<td>0.120</td>
<td>0.24</td>
</tr>
<tr>
<td></td>
<td>NG11-NG12</td>
<td>2</td>
<td>0.115</td>
<td>0.23</td>
</tr>
<tr>
<td></td>
<td>NG18</td>
<td>1</td>
<td>0.100</td>
<td>0.10</td>
</tr>
<tr>
<td></td>
<td>NG20</td>
<td>1</td>
<td>0.080</td>
<td>0.08</td>
</tr>
<tr>
<td></td>
<td>NG15</td>
<td>1</td>
<td>0.072</td>
<td>0.07</td>
</tr>
<tr>
<td>AMU</td>
<td>NG21-NG24</td>
<td>4</td>
<td>8.625</td>
<td>34.50</td>
</tr>
<tr>
<td></td>
<td>NG25-NG27</td>
<td>3</td>
<td>7.000</td>
<td>21.00</td>
</tr>
<tr>
<td>ARU</td>
<td>NG30, NG33, NG35</td>
<td>3</td>
<td>1.215</td>
<td>3.65</td>
</tr>
<tr>
<td></td>
<td>NG28, NG29, NG31, NG32, NG34</td>
<td>5</td>
<td>0.400</td>
<td>2.00</td>
</tr>
</tbody>
</table>

**Total of all units:** 35 64.53

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>1.9</td>
<td>0.08</td>
</tr>
<tr>
<td>PM10</td>
<td>7.6</td>
<td>0.21</td>
</tr>
<tr>
<td>direct PM2.5</td>
<td>7.6</td>
<td>0.21</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.17</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>27.71</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>1.52</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>23.28</td>
</tr>
</tbody>
</table>

**Methodology**

All emission factors are based on normal firing.

\[
\text{MMBtu} = 1,000,000 \text{ Btu} \\
\text{MMCF} = 1,000,000 \text{ Cubic Feet of Gas}
\]

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

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

\[
\text{Emission (tons/yr)} = \text{Throughput (MMCF/yr)} \times \text{Emission Factor (lb/MMCF)/2,000 lb/ton}
\]

**Hazardous Air Pollutants (HAPs)**

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Emission Factor in lb/MMCf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>0.001</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>0.002</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>0.499</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>0.001</td>
</tr>
<tr>
<td>Total - Organics</td>
<td></td>
<td>0.52</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Emission Factor in lb/MMCf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>9.0E-04</td>
<td>0.001</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>0.003</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>0.004</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>0.001</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>0.008</td>
</tr>
<tr>
<td>Total - Metals</td>
<td></td>
<td>1.5E-03</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
## Appendix A: Emission Calculations
### Fugitive Dust Emissions - Paved Roads

**Company Name:** Lippert Components, Inc.  
**Source Address:** 2602 College Ave., Goshen, IN 46528  
**Permit Number:** M039-4202-00074  
**Permit Reviewer:** Daria Antipova

### Paved Roads at Industrial Site

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

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day</th>
<th>Maximum Weight of Loaded Vehicle (ton/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>455.0</td>
<td>1.0</td>
<td>455.0</td>
<td>4.75</td>
<td>2161.3</td>
<td>660</td>
<td>0.125</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>455.0</td>
<td>1.0</td>
<td>455.0</td>
<td>4.75</td>
<td>2161.3</td>
<td>660</td>
<td>0.125</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>910.0</strong></td>
<td><strong>4322.5</strong></td>
<td><strong>113.8</strong></td>
<td><strong>41518.8</strong></td>
<td><strong>4136.6</strong></td>
<td><strong>990.0</strong></td>
<td><strong>690.0</strong></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 4.8 tons/trip  
Average Miles Per Trip = 0.13 miles/trip

Unmitigated Emission Factor, $E_f = \left[ k \cdot (sL)^{0.91} \cdot (W)^{1.02} \right]$ (Equation 1 from AP-42 13.2.1)

where $k = 0.011$  
$W = 4.8$  
$sL = 9.7$

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot \left[ 1 - \frac{p}{4N} \right]$ (Equation 2 from AP-42 13.2.1)  

where $p = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
$N = 365$ days per year

Mitigated Emission Factor, $E_{ext} = E_f \cdot \left[ 1 - \frac{p}{4N} \right]$

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (ton/year)</th>
<th>Mitigated PTE of PM10 (Before Control) (ton/year)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (ton/year)</th>
<th>Mitigated PTE of PM (After Control) (ton/year)</th>
<th>Mitigated PTE of PM10 (After Control) (ton/year)</th>
<th>Mitigated PTE of PM2.5 (After Control) (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>4.04</td>
<td>0.81</td>
<td>0.20</td>
<td>4.04</td>
<td>0.81</td>
<td>0.20</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>4.04</td>
<td>0.81</td>
<td>0.20</td>
<td>4.04</td>
<td>0.81</td>
<td>0.20</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>8.09</strong></td>
<td><strong>1.62</strong></td>
<td><strong>0.40</strong></td>
<td><strong>8.09</strong></td>
<td><strong>1.62</strong></td>
<td><strong>0.40</strong></td>
</tr>
</tbody>
</table>

### Methodology

<table>
<thead>
<tr>
<th>Description</th>
<th>Formula</th>
<th>Abbreviations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Weight driven per day (ton/day)</td>
<td>= [Maximum Weight of Loaded Vehicle (ton/trip)] * [Maximum trips per day (trip/day)]</td>
<td>PM = Particulate Matter</td>
</tr>
<tr>
<td>Maximum one-way distance (mi/trip)</td>
<td>= [Maximum trips per year (trip/day)] / [Maximum one-way distance (mi/trip)]</td>
<td>PM10 = Particulate Matter (&lt;10 um)</td>
</tr>
<tr>
<td>Maximum one-way miles (miles/day)</td>
<td>= SUM[Maximum one-way distance (mi/trip)]</td>
<td>PM2.5 = Particle Matter (&lt;2.5 um)</td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (ton/trip)</td>
<td>= [Maximum Weight of Loaded Vehicle (ton/trip)] * [Maximum trips per day (trip/day)]</td>
<td>PTE = Potential to Emit</td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>= SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]</td>
<td></td>
</tr>
<tr>
<td>Unmitigated Emission Factor (lb/mile)</td>
<td>= [Maximum one-way miles (miles/year)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
<td></td>
</tr>
<tr>
<td>Mitigated Emission Factor (lb/mile)</td>
<td>= [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (Before Control) (ton/year)</td>
<td>= [Mitigated PTE (Before Control) (ton/mile)] * [Maximum one-way miles (miles/yr)]</td>
<td></td>
</tr>
<tr>
<td>Mitigated PTE (After Control) (ton/year)</td>
<td>= [Mitigated PTE (Before Control) (ton/mile)] * [1 - Dust Control Efficiency]</td>
<td></td>
</tr>
</tbody>
</table>
Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch.13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passenger Car (entering plant) (one-way trip)</td>
<td>14.0</td>
<td>1.0</td>
<td>14.0</td>
<td>2.7</td>
<td>37.8</td>
<td>100</td>
<td>0.019</td>
<td>0.3</td>
<td>96.8</td>
</tr>
<tr>
<td>Passenger Car (leaving plant) (one-way trip)</td>
<td>14.0</td>
<td>1.0</td>
<td>14.0</td>
<td>2.7</td>
<td>37.8</td>
<td>100</td>
<td>0.019</td>
<td>0.3</td>
<td>96.8</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>28.0</strong></td>
<td><strong>75.6</strong></td>
<td><strong>0.5</strong></td>
<td><strong>193.6</strong></td>
<td><strong>28.9</strong></td>
<td><strong>75.6</strong></td>
<td><strong>0.5</strong></td>
<td><strong>93.6</strong></td>
<td><strong>93.6</strong></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = \( \frac{2.7 \text{ tons/vehicle}}{14.0 \text{ trips/day}} \) \( \frac{2.7 \text{ tons/vehicle}}{96.8 \text{ miles/yr}} \)

Average Miles Per Trip = \( \frac{0.019 \text{ miles/trip}}{14.0 \text{ trips/day}} \)

NOTE: Average distance through unpaved (gravel) lot is approximately 100 feet until pavement.

Unmitigated Emission Factor, \( E_f = k \cdot \frac{s}{12} \cdot \frac{W/3}{a} \) (Equation 1a from AP-42 13.2.2)

Where:
- \( k = \) particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( s = \) mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
- \( a = \) constant (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( W = \) average vehicle weight
- \( b = \) constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Mitigated Emission Factor, \( E_{ext} = E \cdot \frac{365 - P}{365} \) (Equation 2 from AP-42 13.2.2)

Where:
- \( P = \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
<td>0.09</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>0.18</strong></td>
<td><strong>0.18</strong></td>
<td><strong>0.18</strong></td>
<td><strong>0.18</strong></td>
<td><strong>0.18</strong></td>
<td><strong>0.18</strong></td>
</tr>
</tbody>
</table>

Methodology
- Total Weight driven per day (ton/day) = \( \frac{\text{Maximum Weight of Loaded Vehicle (tons/trip)} \cdot \text{Maximum trips per day (trip/day)}}{\text{Maximum one-way distance (miles/trip)}} \)
- Maximum one-way miles (miles/day) = \( \frac{\text{Maximum one-way miles per year (trip/day)}}{\text{Maximum one-way distance (miles/trip)}} \)
- Average Vehicle Weight Per Trip (ton/trip) = \( \frac{\text{Maximum Weight of Loaded Vehicle (tons/trip)} \cdot \text{Maximum trips per day (trip/day)}}{\text{Maximum one-way distance (feet/trip)}} \)
- Mitigated PTE (Before Control) (tons/yr) = \( \frac{\text{Mitigated PTE of PM (Before Control) (tons/yr)}}{\text{Mitigated PTE of PM (Before Control) (tons/yr)}} \) (1 - Dust Control Efficiency)

Abbreviations
- PM = Particulate Matter
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
December 4, 2019

Mr. Edward Ahlersmeyer  
Lippert Components, Inc. 
3501 CR 6 East 
Elkhart, IN  46514

Re: Public Notice  
Lippert Components, Inc. 
Permit Level: MSOP - Permit 
Permit Number: 039-42092-00764

Dear Mr. Ahlersmeyer:

Enclosed is a copy of your draft MSOP Permit, Technical Support Document, emission calculations, and the Public Notice.

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

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

OAQ has submitted the draft permit package to the Goshen Public Library, 601 S. 5th Street in Goshen, IN 46526. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Daria Antipova, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-3429 or dial (317) 234-3439.

Sincerely,

Vicki Biddle

Vicki Biddle 
Permits Branch 
Office of Air Quality

Enclosures 
PN Applicant Cover Letter 4/12/19
December 4, 2019

To: Goshen Public Library

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

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

Applicant Name: Lippert Components, Inc.
Permit Number: 039-42092-00764

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

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.
Notice of Public Comment

December 4, 2019
Lippert Components, Inc.
039-42092-00764

Dear Concerned Citizen(s):

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

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

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter  4/12/2019
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<td>Edward Ahlersmeyer  Lippert Components Inc 3501 CR 6 E Elkhart IN 46514 (Source CAATS)</td>
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<td>Tevon Reed  General Manager  Lippert Components Inc 3501 CR 6 E Elkhart IN 46514  (RO CAATS)</td>
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<td>Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516  (Health Department)</td>
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<td>Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542  (Affected Party)</td>
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<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526  (Affected Party)</td>
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<td>Keir Stiegler U.S. Compliance 520 Third St., Ste. 100 Excelsior MN 55331  (Consultant)</td>
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