



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Lippert Components, Inc. Plant 72 in Elkhart County

Significant Permit Modification No.: 039-43153-00498

The Indiana Department of Environmental Management (IDEM) has received an application from Lippert Components, Inc. Plant 72, located at 2501 Jeanwood Drive, Elkhart, Indiana 46514, for a significant modification of its Part 70 Operating Permit issued on January 23, 2018. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Lippert Components, Inc. Plant 72, to make certain changes at its existing source. Lippert Components, Inc. Plant 72, has applied to add one (1) shot blast unit identified as SB-2.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, 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). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Elkhart Public Library
3429 E Bristol Street
Elkhart, IN 46514

and

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

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing,

IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 039-43153-00498 in all correspondence.

Comments should be sent to:

Hachem Ismaili Alaoui
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Hachem Ismaili Alaoui or (317) 232-2827
Or dial directly: (317) 232-2827
Fax: (317) 232-6749 attn: Hachem Ismaili Alaoui
E-mail: HIAlaoui@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, 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 Hachem Ismaili Alaoui of my staff at the above address.



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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Mr. Ricky Seward
Lippert Components, Inc. Plant 72
2501 Jeanwood Drive
Elkhart, IN 46514

Re: 039-43153-00498
Significant Permit Modification

Dear Mr. Seward:

Lippert Components, Inc. Plant 72 was issued Part 70 Operating Permit Renewal No. T039-39009-00498 on January 23, 2018 for a stationary trailer frame fabrication and surface coating plant located at 2501 Jeanwood Drive, Elkhart, Indiana 46514. An application requesting changes to this permit was received on August 3, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 60, Subpart EE, NSPS Surface Coating of Metal Furniture

Previously issued approvals for this source containing this attachment are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <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. 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>.

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

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If you have any questions regarding this matter, please contact Hachem Ismaili Alaoui, 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) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Part 70 Operating Permit OFFICE OF AIR QUALITY

**Lippert Components, Inc. - Plant 72
2501 Jeanwood Drive
Elkhart, Indiana 46514**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-39009-00498	
Master Agency Interest ID.: 37082	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: January 23, 2018 Expiration Date: January 23, 2023

Significant Permit Modification No. 039-41047-00498, issued on 2019.

Significant Permit Modification No.: 039-43153-00498	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: January 23, 2023

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Attachment A: 40 CFR 60, Subpart EE - Surface Coating of Metal Furniture		

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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 through A.3 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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame fabrication and surface coating plant.

Source Address:	2501 Jeanwood Drive, Elkhart, Indiana 46514
General Source Phone Number:	574-312-6309
SIC Code:	3499 (Fabricated Metal Products, Not Elsewhere Classified)
	3714 (Motor Vehicle Parts and Accessories)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) epoxy and acrylic electro coating operation, utilizing eighteen (18) dip tanks, constructed in 1998, using no control, and consisting of the following equipment:
- (1) Two (2) dip tanks, one (1) tank using epoxy and one (1) tank using acrylic dip application method, with an aggregate maximum capacity of 181.2 pounds of resin per hour as part of a maximum coating capacity of 129 gallons per hour, using greater than 3,842 liters of organic coatings per year, coating metal furniture and other miscellaneous parts, and exhausting to vent EF5.
 - (2) Pre-rinse baths, consisting of sixteen (16) tanks, used to rinse metal parts after surface prep and prior to acrylic or epoxy dip coating process, containing aqueous cleaning solution, consisting of heated water and a biocide for bacterial control, using 166.8 pounds of aqueous cleaner per hour with no VOC/HAP emissions, exhausting to vents EF1 through EF4 and Stacks S1 and S2.
 - (3) One (1) cool down area, venting inside.
 - (4) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr, exhausting to stack S3 through S6.
 - (5) One (1) natural gas-fired burn-off oven, identified as BOO-2, constructed in 2014, used for cleaning paint residue from metal coating racks in the epoxy and acrylic electro coating operation, consisting of a single chamber with an afterburner, and having a maximum heat input capacity of 2.0 MMBtu/hr, using no control, exhausting through stack S7.

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This is considered an affected facility under 40 CFR 60, Subpart EE.

- (b) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:
 - (1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 30 metal parts per hour, with emissions controlled by dry filters, exhausting to stack PB1.
 - (2) One (1) flash-off/cool down area, no control and exhausting to stack PB3.
 - (3) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.
- (c) One (1) paint booth, identified as CARC2 Spray Booth, constructed in 2009, consisting of two (2) spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.
- (d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:
 - (1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2.

The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
 - (2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.
 - (3) One (1) powder coating booth, identified as PC-1, with a maximum capacity of coating 3000 square feet of metal per hour and 4.91 tons per hour, equipped with cartridge filters for particulate control. The booth includes one (1) powder recycling unit which exhausts inside the plant.
 - (4) One (1) natural gas-fired bake/cure oven, identified as BKO-2, constructed in 1998 and modified in 2014 to be used for the curing of powder coat paint, with a maximum heat input capacity of 1.6 MMBtu/hr, exhausting to stack S3 through S6.
 - (5) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.
- (e) One (1) shot blast unit, identified as SB-2, approved in 2020 for construction, using four (4) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, using a baghouse CD-1 as control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, constructed in 1998, each with a maximum heat input capacity of 7.0 MMBtu/hr, used to provide indirect heat for hot water.
- (b) Four (4) natural gas direct-fired air handling units, identified as Air Handler Unit 1 through

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Air Handler Unit 4, constructed in 2015, each with a maximum heat input capacity of 10.0 MMBtu, exhausting inside.

- (c) Machining operations, consisting of the following activities:
- (1) One hundred-fifty (150) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. Five (5) units constructed in 2008, eighty-five (85) units constructed in 2000, and sixty (60) units approved for construction in 2017.
 - (2) Twenty-five (25) Plasma Flame Cutting units with a maximum metal thickness of 0.25 inches and maximum metal cutting rate of 145 inches per minute per station. Thirteen (13) units constructed in 2015, and twelve (12) units approved for construction in 2017.
 - (3) Twenty (20) propane direct-fired rosebud torch units, identified as P-1 through P-20, used to heat steel for bending, approved for construction in 2017, each with a maximum heat input capacity of 0.863 MMBtu/hr, for a total heat input capacity of 17.26 MMBtu.
- (d) Final finish grinding operations, consisting of thirty (30) hand grinders used to smooth out rough areas on the final finish, and can include deburring, buffing and polishing, no control, exhausting indoors.
- (e) One (1) shot blast unit, identified as SB-1, constructed in 2016, using two (2) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, and a total of 24,000 pounds of metal chassis per hour, using a baghouse for control and exhausting to the general atmosphere.
- (f) Degreasing operations consisting of a cold cleaner parts washer constructed in 2015, with a three gallon incorporated solvent reservoir, using less than 20 gallons solvent per twelve (12) months.
- (g) Paved roads and parking lots with public access.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T039-39009-00498, 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, including any permit shield provided in 326 IAC 2-7-15, 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 [326 IAC 2-7-7][IC 13-17-12]

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 [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (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 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

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- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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 annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

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

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

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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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- (d) 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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

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(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T039-39009-00498 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-

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5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 nine (9) months 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 2-7 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

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deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233 8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

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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. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.

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Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for 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

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MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

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C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

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- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C -

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General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime

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associated with zero and span or other daily calibration checks, if applicable);
and

- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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) 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.
- (d) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) epoxy and acrylic electro coating operation, utilizing eighteen (18) dip tanks, constructed in 1998, using no control, and consisting of the following equipment:
- (1) Two (2) dip tanks, one (1) tank using epoxy and one (1) tank using acrylic dip application method, with an aggregate maximum capacity of 181.2 pounds of resin per hour as part of a maximum coating capacity of 129 gallons per hour, using greater than 3,842 liters of organic coatings per year, coating metal furniture and other miscellaneous parts, and exhausting to vent EF5.
 - (2) Pre-rinse baths, consisting of sixteen (16) tanks, used to rinse metal parts after surface prep and prior to acrylic or epoxy dip coating process, containing aqueous cleaning solution, consisting of heated water and a biocide for bacterial control, using 166.8 pounds of aqueous cleaner per hour with no VOC/HAP emissions, exhausting to vents EF1 through EF4 and Stacks S1 and S2.
 - (3) One (1) cool down area, venting inside.
 - (4) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr, exhausting to stack S3 through S6.
 - (5) One (1) natural gas-fired burn-off oven, identified as BOO-2, constructed in 2014, used for cleaning paint residue from metal coating racks in the epoxy and acrylic electro coating operation, consisting of a single chamber with an afterburner, and having a maximum heat input capacity of 2.0 MMBtu/hr, using no control, exhausting through stack S7.
- This is considered an affected facility under 40 CFR 60, Subpart EE.
- (b) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:
- (1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 30 metal parts per hour, with emissions controlled by dry filters, exhausting to stack PB1.
 - (2) One (1) flash-off/cool down area, no control and exhausting to stack PB3.
 - (3) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.
- (c) One (1) paint booth, identified as CARC2 Spray Booth, constructed in 2009, consisting of two (2) spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.
- (d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:
- (1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2.

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The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

- (2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.
- (3) One (1) powder coating booth, identified as PC-1, with a maximum capacity of coating 3000 square feet of metal per hour and 4.91 tons per hour, equipped with cartridge filters for particulate control. The booth includes one (1) powder recycling unit which exhausts inside the plant.
- (4) One (1) natural gas-fired bake/cure oven, identified as BKO-2, constructed in 1998 and modified in 2014 to be used for the curing of powder coat paint, with a maximum heat input capacity of 1.6 MMBtu/hr, exhausting to stack S3 through S6.
- (5) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.

(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 2-7-5(1)]

D.1.1 PSD Minor Limit - VOC [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents, from the following shall not exceed a total of 247.23 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (a) One (1) epoxy and acrylic electro coating operation, consisting of eighteen (18) dip tanks;
- (b) One (1) spray booth, identified as CARC1 Spray Booth; and,
- (c) One (1) paint booth identified as CARC2 Spray Booth.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

D.1.2 PSD Minor Limit - PM, PM10 and PM2.5 [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions after control from the powder coating booth PC-1 shall not exceed 10.27 pounds per hour.
- (b) PM10 emissions after control from the powder coating booth PC-1 shall not exceed 10.27 pounds per hour.
- (c) PM2.5 emissions after control from the powder coating booth PC-1 shall not exceed 10.27 pounds per hour.

Compliance with the above limits, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at the source, shall limit the PM, PM10 and PM2.5 from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

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D.1.3 Particulate Matter (PM) Control [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from CARC1 Spray Booth and CARC2 Spray Booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e), particulate emissions from the powder coating booth (PC-1) shall not exceed 11.91 pounds per hour when operating at a process weight rate of 4.91 tons per hour.

This pound per hour limitation is based upon the following:

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

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

D.1.4 Volatile Organic Compound (VOC) Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(c)(2) when CARC1 Spray Booth, CARC2 Spray Booth, and the Epoxy and Acrylic electro coating operation dip tanks are coating metal parts, the owner or operator shall not allow the discharge of VOC into the atmosphere in excess of:
 - (1) Three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in a coating application system that is air dried or forced warm air dried, from each of the spray booths or epoxy and acrylic dip tanks.
 - (2) Four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator that applies clear coatings, from each of the spray booths or epoxy and acrylic dip tanks. A clear coating is a coating that:
 - (A) Lacks color or opacity; and
 - (B) Is transparent and uses the undercoat as a reflectant base or undertone color.
- (b) Pursuant to 326 IAC 8-2-9(f), when CARC1 Spray Booth, CARC2 Spray Booth and Epoxy and Acrylic electro coating operation dip tanks are coating metal parts, work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials.

Work practices shall include, but not limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

D.1.5 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6 (Metal Furniture Coating Operations), when the epoxy and acrylic electro coating operation dip tanks are coating metal furniture parts, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for prime and topcoat or single coat operations.

D.1.6 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

Part of the source's operation consists of surface coating military vehicles, if emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC limitations contained in Conditions D.1.1, D.1.4(a), and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.4(a), shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The daily volume weighted average shall be performed separately for each of the following:

- (a) One (1) epoxy and acrylic electro coating operation, consisting of eighteen (18) dip tanks;
- (b) One (1) spray booth, identified as CARC1 Spray Booth; and,
- (c) One (1) paint booth identified as CARC2 Spray Booth.

This volume weighted average shall be determined by the following equation:

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

Where:

- A = volume weighted average in pounds VOC per gallon less water as applied for each spray booth or dip tank
- C = VOC content of the coating in pounds VOC per gallon less water as applied for each spray booth or dip tank
- U = usage rate of the coating in gallons per day for each spray booth or dip tank

D.1.10 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.1.2 and D.1.3, the dry filters equipped on CARC1 Spray Booth and CARC2 Spray Booth and the cartridge filters equipped on PC-1 shall

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be in operation and control emissions at all times these emission units are in operation.

- (b) In the event that cartridge filters failure is observed in multi-compartment cartridge filters, 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.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.11 Monitoring [40 CFR 64]

Pursuant to 40 CFR 64 (CAM), the following requirements shall apply:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge filters used to control emissions from powder coating booth PC-1.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operations CARC1 Spray Booth and CARC2 Spray Booth.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.1.12 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1, D.1.4(a), and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1, D.1.4(a), and D.1.5.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month; and
 - (5) The total VOC usage for each month.
 - (6) The calculated daily volume weighted average as determined using the equation in Condition D.1.9.
- (b) To document the compliance status with Condition D.1.11, the Permittee shall maintain a log of daily inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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D.1.13 Reporting Requirement

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) shot blast unit, identified as SB-2, approved in 2020 for construction, using four (4) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, using a baghouse CD-1 as control, and exhausting indoors.

Insignificant activities:

- (a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, constructed in 1998, each with a maximum heat input capacity of 7.0 MMBtu/hr, used to provide indirect heat for hot water.
- (d) One (1) shot blast unit, identified as SB-1, constructed in 2016, using two (2) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, and a total of 24,000 pounds of metal chassis per hour, using a baghouse for control and exhausting to the general atmosphere.
- (e) Degreasing operations consisting of a cold cleaner parts washer constructed in 2015, with a three gallon incorporated solvent reservoir, using less than 20 gallons solvent per twelve (12) months.

(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 2-7-5(1)]

D.2.1 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from Boiler BO-1 and Boiler BO-2, shall each not exceed 0.55 pounds per MMBtu heat input.

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), particulate emissions from the shot blast units SB-1 and SB-2, shall not exceed the emissions limits listed in the table below:

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

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

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Shot Blasting Unit SB-1	12.13	21.83	$E = 4.10 P^{0.67}$
Shot Blasting Unit SB-2	0.26	1.66	$E = 4.10 P^{0.67}$

D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following requirements for the degreasers:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.

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- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in items (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure that the following additional control equipment and operating requirements are met for the degreasers:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.4 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.6 Particulate Control

In order to assure compliance with Condition D.2.2, the baghouse CD-1 shall be in operation and control emissions from the shot blast unit SB-2 at all times the shot blast unit SB-2 is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.7 Baghouse Inspections

The Permittee shall perform semi-annual inspections of the baghouse CD-1 controlling particulate

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emissions from the shot blast unit SB-2 to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section 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 emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section 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 Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D. 2.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
 - (6) All records required by Condition D.2.6(a)(1) through (5) shall be:
 - (A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (B) reasonably accessible for an additional two (2) year period.
- (b) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the dates and results of the semi-annual inspections required under Condition D.2.7.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) epoxy and acrylic electro coating operation, utilizing eighteen (18) dip tanks, constructed in 1998, using no control, and consisting of the following equipment:
- ***
- (5) One (1) natural gas-fired burn-off oven, identified as BOO-2, constructed in 2014, used for cleaning paint residue from metal coating racks in the epoxy and acrylic electro coating operation, consisting of a single chamber with an afterburner, and having a maximum heat input capacity of 2.0 MMBtu/hr, using no control and exhausting through stack S7.

(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 2-7-5(1)]

D.3.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2 (Incinerators), the natural gas-fired burn off oven (BOO-2) shall comply with the following:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of one (1) of the following:
 - (1) Three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions correct to fifty percent (50%) excess air for incinerators with solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
 - (2) Five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity of less than two hundred (200) pounds per hour.
- (f) If any of the requirements of (a) through (e) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

An owner or operator developing an operation and maintenance plan pursuant to paragraph (d) must comply with the following:

- (a) The operation and maintenance plan must be designed to meet the particulate matter emission limitation and shall include the following: procedures for receiving, handling, and

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charging waste, procedures for incinerator startup and shutdown, procedures for responding to a malfunction, procedures for maintaining proper combustion air supply levels, procedures for operating the incinerator and associated air pollution control systems, procedures for handling ash, and a list of wastes that can be burned in the incinerator.

- (b) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
- (c) The operation and maintenance plan must be readily accessible to incinerator operators.
- (d) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

The Permittee operating the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

D.3.2 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the Permittee shall not operate the natural gas-fired burn off oven, unless the waste gas stream is burned in one of the following:

- (a) Direct-flame afterburner; or
- (b) Secondary chamber.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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SECTION E.1

NSPS

Emissions Unit Description:

- (a) One (1) epoxy and acrylic electro coating operation, utilizing eighteen (18) dip tanks, constructed in 1998, using no control, and consisting of the following equipment:
- (1) Two (2) dip tanks, one (1) tank using epoxy and one (1) tank using acrylic dip application method, with an aggregate maximum capacity of 181.2 pounds of resin per hour as part of a maximum coating capacity of 129 gallons per hour, using greater than 3,842 liters of organic coatings per year, coating metal furniture and other miscellaneous parts, and exhausting to vent EF5.
 - (2) Pre-rinse baths, consisting of sixteen (16) tanks, used to rinse metal parts after surface prep and prior to acrylic or epoxy dip coating process, containing aqueous cleaning solution, consisting of heated water and a biocide for bacterial control, using 166.8 pounds of aqueous cleaner per hour with no VOC/HAP emissions, exhausting to vents EF1 through EF4 and Stacks S1 and S2.
 - (3) One (1) cool down area, venting inside.
 - (4) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr, exhausting to stack S3 through S6.
 - (5) One (1) natural gas-fired burn-off oven, identified as BOO-2, constructed in 2014, used for cleaning paint residue from metal coating racks in the epoxy and acrylic electro coating operation, consisting of a single chamber with an afterburner, and having a maximum heat input capacity of 2.0 MMBtu/hr, using no control, exhausting through stack S7.

This is considered an affected facility under 40 CFR 60, Subpart EE.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.40c, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, for the emission units listed above, except when otherwise specified in 40 CFR Part 60, Subpart EE.
- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

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E.1.2 Surface Coating of Metal Furniture NSPS [40 CFR Part 60, Subpart EE][326 IAC 12]

Pursuant to 40 CFR Part 60, Subpart EE, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart EE, which are incorporated by reference as 326 IAC 12 (included as Attachment A of this permit), for the above listed emissions units as specified as follows.:

- (1) 40 CFR 60.310 (a), (b)
- (2) 40 CFR 60.311
- (3) 40 CFR 60.312
- (4) 40 CFR 60.313 (b), (c)(1)
- (5) 40 CFR 60.315 (a)(1)(2), (b), (d)
- (6) 40 CFR 60.316

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Lippert Components, Inc. - Plant 72
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-39009-00498

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Lippert Components, Inc. - Plant 72
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-39009-00498

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
--

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Lippert Components, Inc. - Plant 72
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-39009-00498
Facility: Epoxy and Acrylic electro coating operation, CARC1 Spray Booth, and CARC2 Spray Booth
Parameter: The total VOC input, including coatings, dilution solvents, and cleaning solvents
Limit: Shall not exceed a total of 247.23 tons per twelve (12) consecutive month period, with compliance determined at the end of each month (Condition D.1.1)

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lippert Components, Inc. - Plant 72
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-39009-00498

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Lippert Components, Inc. Plant 72
Source Location:	2501 Jeanwood Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3499 (Fabricated Metal Products, Not Elsewhere Classified)
	3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	T 039-39009-00498
Operation Permit Issuance Date:	January 23, 2018
Minor Source Modification No.:	039-43110-00498
Significant Permit Modification No.:	039-43153-00498
Permit Reviewer:	Hachem Ismaili Alaoui

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 039-39009-00498 on January 23, 2018. The source has since received the following approvals:

- (a) Part 70 Significant Permit Modification No. 039-41047-00498, issued on July 15, 2019.

County Attainment Status

The source is located in Elkhart County.

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

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

- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 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 applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. 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.

	Source-Wide Emissions Prior to Modification (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	63.84	64.41	64.41	0.31	42.30	249.79	32.71	0.73	1.62

	Source-Wide Emissions Prior to Modification (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of Part 70 Significant Permit Modification No. 039-41047-00498, issued on July 15, 2019.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lippert Components, Inc. on August 3, 2020, relating to addition of one (1) shot blast unit identified as SB-2.

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

- (a) One (1) shot blast unit, identified as SB-2, approved in 2020 for construction, using four (4) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, using baghouse CD-1 as control, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. 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.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
Shot Blast Unit SB-2	9.11	7.83	7.83	--	--	--	--	--	--
Total PTE Before Controls of the New Emission Units:	9.11	7.83	7.83	--	--	--	--	--	--

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(e)(1)(A), a Minor Source Modification is required because this modification has the potential to emit PM, PM₁₀, and direct PM_{2.5} that is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and/or permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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.

Process / Emission Unit	Project Emissions (ton/year)						
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO
Shot Blast Unit SB-2	9.11	7.83	7.83	--	--	--	--
Total for Modification	9.11	7.83	7.83	--	--	--	--
PSD Major Source Thresholds	250	250	250	250	250	250	250

¹PM_{2.5} listed is direct PM_{2.5}.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) for more information regarding the limit(s).

- (a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and/or permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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.

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	63.85	64.42	64.42	0.31	42.30	249.80	32.71	1.49	1.81
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

These are existing limits that are not being adjusted in this Minor Permit Modification.

- (a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.
- (b) This existing area source of HAP will continue to be an area source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability 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 for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

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

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Shot Blast Unit SB-2 / PM	BH	326 IAC 6-2-3	<100	-	N	--
Shot Blast Unit SB-2 / PM10	BH	326 IAC 6-2-3	<100	-	N	--
Shot Blast Unit SB-2 / PM2.5	BH	326 IAC 6-2-3	<100	-	N	--
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.						
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO ₂ , NO _x , VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.						
PM*	For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.					
N	CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.					
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to the shot blasting unit SB-2 as part of this modification.

State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)

PSD is discussed under the Permit Level Determination – PSD of this document.

PSD Minor Source Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The total VOC input, including coatings, dilution solvents, and cleaning solvents at the facilities listed below shall not exceed a total of 247.23 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (1) One (1) epoxy and acrylic electro coating operation, consisting of eighteen (18) dip tanks;
 - (2) One (1) spray booth, identified as CARC1 Spray Booth; and
 - (3) One (1) paint booth identified as CARC2 Spray Booth.

This existing limit is not being changed in this minor source modification.

- (b) The PM, PM10, and PM2.5 emissions from the powder coating booth, identified as PC-1 shall not exceed 10.27 pounds per hour.

This existing limit is not being changed in this minor source modification.

Compliance with these limits, combined with the potential to emit VOC, PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of VOC, PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

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

326 IAC 2-6 (Emission Reporting)

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual

compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in 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.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)

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

State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

Shot Blast Unit SB-2

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blast unit SB-2 shall not exceed 1.66 pounds per hour when operating at a process weight rate of 0.26 tons per hour. The pound per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \\ P = 130 \text{ lbs/hr} * 4 * 1 \text{ ton}/2000 \text{ lbs} = 0.26 \text{ ton/hr} \end{array}$$

The baghouse CD-1 shall be in operation at all times the shot blast unit SB-2 is in operation in order to comply with this limit.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Testing Requirements:

IDEM OAQ has determined that testing of the baghouse CD-1 is not required at this time to determine compliance with the PM emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

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

Emission Unit	Control Device	Type of Parametric Monitoring	Frequency	Range or Specification
Shot Blast Unit SB-2	Baghouse CD-1	Baghouse inspections	Semi-annual	Verify that it is operated and maintained per manufacturer's specifications

These monitoring conditions are necessary because the baghouse CD-1 for the shot blast unit SB-2 must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text (these changes may include Title I changes):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(e) **One (1) shot blast unit, identified as SB-2, approved in 2020 for construction, using four (4) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, using a baghouse CD-1 as control, and exhausting indoors.**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) **One (1) shot blast unit, identified as SB-2, approved in 2020 for construction, using four (4) nozzles, each with a maximum capacity of 130 pounds of steel shot per hour, using a baghouse CD-1 as control, and exhausting indoors.**

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

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), particulate emissions from the shot blast units identified as SB-1 and SB-2, shall not exceed the emissions limits listed in the table below: ~~21.826 pounds per hour when operating at a process weight rate of 12.13 tons (24,260 pounds) per hour.~~

~~This pound per hour limitation is based upon the following:~~

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

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

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Shot Blast Unit SB-1	12.13	21.83	$E = 4.10 P^{0.67}$
Shot Blast Unit SB-2	0.26	1.66	$E = 4.10 P^{0.67}$

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.6 Particulate Control

In order to assure compliance with Condition D.2.2, the baghouse CD-1 shall be in operation and control emissions from the shot blast unit SB-2 at all times the shot blast unit SB-2 is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.2.7 Baghouse Inspections

The Permittee shall perform semi-annual inspections of the baghouse CD-1 controlling particulate emissions from the shot blast unit SB-2 to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down

immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section 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 emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section 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 Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D. 2.9 ~~2-6~~ Record Keeping Requirements

- (b) **To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the dates and results of the semi-annual inspections required under Condition D.2.7.**
- (c) ~~(b)~~ Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

Additional Changes

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

- (1) IDEM, OAQ has made model updates to standard permit language in the Sections B of the permit to help clarify the intent of these requirements.

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 **8590** (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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 August 3, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-43110-00498. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-43153-00498.

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Hachem Ismaili Alaoui, 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) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations
Emissions summary

Company Name: Lippert Components, Inc. Plant 72
Address City IN Zip: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Uncontrolled Potential Emissions (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Epoxy and Acrylic electro coating operation	0.00	0.00	0.00	--	--	372.26	--	--	--	--
Spray booth (CARC1)	5.77	5.77	5.77	--	--	23.44	--	0.85	0.62	xylene
Spray booth (CARC2)	3.59	3.59	3.59	--	--	4.25	--	0.18	0.11	xylene
cleanup solvent	--	--	--	--	--	0.97	--	--	--	--
powder coating booth (PC-1)	448.07	448.07	448.07	--	--	--	--	--	--	--
NG Combustion	0.60	2.40	2.40	0.19	31.56	1.74	26.51	0.60	0.57	hexane
Propane rosebud torch units	0.17	0.58	0.58	0.12	10.74	0.83	6.20	--	--	--
Welding and Flame Cutting	3.06	3.06	3.06	--	--	--	--	0.19	0.19	manganese
Final finish grinding	1.12	0.11	0.11	--	--	--	--	--	--	--
Shot Blast Unit SB-1	4.56	3.92	3.92	--	--	--	--	--	--	--
Shot Blast Unit SB-2	9.11	7.83	7.83	--	--	--	--	--	--	--
Degreasing operation	--	--	--	--	--	0.004	--	--	--	--
PTE of Entire Source	476.04	475.34	475.34	0.31	42.30	403.48	32.71	1.81	1.49	xylene
Paved roads - fugitives	0.44	0.09	0.02	--	--	--	--	--	--	--

Limited/Controlled Emissions (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC *	CO	Total HAPs	Worst Single HAP	
Epoxy and Acrylic electro coating operation	0.00	0.00	0.00	--	--	247.23	--	--	--	--
Spray booth (CARC1)	5.77	5.77	5.77	--	--		--	0.85	0.62	xylene
Spray booth (CARC2)	3.59	3.59	3.59	--	--		--	0.18	0.11	xylene
cleanup solvent	--	--	--	--	--	--	--	--	--	--
powder coating booth (PC-1) **	44.98	44.98	44.98	--	--	--	--	--	--	--
NG Combustion	0.60	2.40	2.40	0.19	31.56	1.74	26.51	0.60	0.57	hexane
Propane rosebud torch units	0.17	0.58	0.58	0.12	10.74	0.83	6.20	--	--	--
Welding and Flame Cutting	3.06	3.06	3.06	--	--	--	--	0.19	0.19	manganese
Final finish grinding	1.12	0.11	0.11	--	--	--	--	--	--	--
Shot Blast Unit SB-1	4.56	3.92	3.92	--	--	--	--	--	--	--
Shot Blast Unit SB-2	0.01	0.01	0.01	--	--	--	--	--	--	--
Degreasing operation	--	--	--	--	--	0.004	--	--	--	--
PTE of Entire Source	63.85	64.42	64.42	0.31	42.30	249.80	32.71	1.81	1.49	xylene
Paved roads - fugitives	0.44	0.09	0.02	--	--	--	--	--	--	--

* 326 IAC 2-2 PSD Minor limit for VOC

** 326 IAC 2-2 PSD Minor limit for PM, PM10 and PM2.5

**Appendix A: Emission Calculations
Modification Summary**

Company Name: Lippert Components, Inc. Plant 72
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Uncontrolled Potential to Emit (tons/yr)									
Emissions Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs	Worset Single HAP
Shot Blast Unit SB-2	9.11	7.83	7.83	--	--	--	--	--	--
Total	9.11	7.83	7.83	0.00	0.00	0.00	0.00	--	--

* PM2.5 listed is direct PM2.5

Potential to Emit after Control (tons/yr)									
Emissions Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	Total HAPs	Worset Single HAP
Shot Blast Unit SB-2	0.009	0.008	0.008	--	--	--	--	--	--
Total	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	--

* PM2.5 listed is direct PM2.5

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Lippert Components, Inc. Plant 72
Address City IN Zip: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismail Alauqi

Material	SDS ID #	Application	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Control Efficiency	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Epoxy and Acrylic electro coating operation																				
Acrylics (as supplied) - Powercron CR935 (Resin)	101985	E-Coat	8.7	76.50%	68.5%	8.0%	71.1%	23.50%	5.67900	15.400	2.40	0.69	60.73	1457.52	266.00	0.00	N/A	0.00	2.95	100%
Acrylics (as supplied) - Powercron 639J (Paste)	101984	E-Coat	9.5	58.00%	45.7%	12.3%	51.8%	33.00%	0.48750	15.400	2.42	1.17	8.77	210.54	38.42	0.00	N/A	0.00	3.54	100%
Epoxy (as supplied) - Powercron 6000		E-Coat	9.1	57.08%	52.1%	4.95%	64.8%	38.31%	1.88000	18.390	1.27	0.45	15.49	371.71	67.84	0.00	N/A	0.00	1.17	100%
subtotal															372.26	0.00				
CARC1 Spray Booth																				
37030 Black VOHAPS/Silica Free Zenthane MIL-DTL-53039E Type IX	102317	Spray	8.32	40.68%	3.7%	37.0%	4.3%	59.32%	0.01845	30	3.21	3.08	1.70	40.86	7.46	2.99	80%	0.60	5.19	75%
Genesis M 3.5 Low VOC Hardener	102336	Spray	8.78	33.20%	0.0%	33.2%	0.0%	66.80%	0.00000	30	2.91	2.91	0.00	0.00	0.00	0.00	80%	0.00	4.36	75%
Genesis M FPC UPS Brown	102321	Spray	8.14	46.10%	0.0%	46.1%	0.0%	53.90%	0.00035	30	3.75	3.75	0.04	0.95	0.17	0.05	80%	0.01	6.96	75%
Genesis M FPC White	102320	Spray	10.26	34.40%	0.00%	34.4%	0.00%	65.60%	0.00264	30	3.53	3.53	0.28	6.72	1.23	0.58	80%	0.12	5.38	75%
Genesis Standard Accelerator	102365	Spray	8.13	98.90%	0.00%	98.9%	0.00%	1.10%	0.00004	30	8.04	8.04	0.01	0.24	0.04	0.00	80%	0.00	730.96	75%
Green 383 34094 VOHAP Free Zenthane MIL-DTL-53039E Type IX	102327	Spray	9.36	34.20%	0.01%	34.2%	0.01%	65.80%	0.00000	30	3.20	3.20	0.00	0.00	0.00	0.00	80%	0.00	4.86	75%
Invirapoxy clear base	102333	Spray	11.63	24.11%	0.00%	24.1%	0.00%	75.89%	0.00005	30	2.80	2.80	0.00	0.11	0.02	0.02	80%	0.00	3.69	75%
Invirapoxy S/G Catalyst	102332	Spray	11.56	24.22%	0.00%	24.2%	0.00%	75.78%	0.00005	30	2.80	2.80	0.00	0.10	0.02	0.01	80%	0.00	3.69	75%
Lippert Black HS 2K	102326	Spray	8.67	41.15%	0.00%	41.2%	0.00%	58.85%	0.00020	30	3.57	3.57	0.02	0.52	0.09	0.03	80%	0.01	6.06	75%
N-9632A 65%Zinc Epoxy Primer	102314	Spray	16.73	17.93%	0.00%	17.9%	0.00%	82.07%	0.00041	30	3.00	3.00	0.04	0.88	0.16	0.18	80%	0.04	3.66	75%
Organic Zinc Rich, Single Component, Moisture Cure Primer	101797	Spray	21.36	18.63%	0.00%	18.6%	0.00%	81.37%	0.00135	30	3.98	3.98	0.16	3.88	0.71	0.77	80%	0.15	4.89	75%
Powercron 935 Black Electrocoat Touch-up Aerosol	102331	Spray	6.30	44.93%	0.00%	44.9%	0.00%	55.07%	0.00953	30	2.83	2.83	0.81	19.41	3.54	1.09	80%	0.22	5.14	75%
T-422 Reduced Hardener	101916	Spray	9.83	9.32%	0.00%	9.3%	0.00%	90.68%	0.00008	30	0.92	0.92	0.00	0.05	0.01	0.02	80%	0.00	1.01	75%
Tan 686A 33446 VHF 1.0 VOC Zenthane MIL-DTL-53039E Type IV	102337	Spray	11.17	43.92%	38.52%	5.4%	38.38%	56.08%	0.00008	30	0.98	0.60	0.00	0.04	0.01	0.02	80%	0.00	1.08	75%
Methyl N-Amyl Ketone SOLVENT	103490	Spray	6.76	100.00%	0.00%	100.00%	0.00%	0.00%	0.01124	30	6.76	6.76	2.28	54.69	9.98	0.00	80%	0.00	0.00	75%
subtotal															23.44	5.77	--	1.15		
CARC2 Spray Booth																				
POLANE Exterior Catalyst 102338	102338	Spray	9.44	10.00%	0.0%	10.0%	0.0%	90.00%	0.02000	8	0.94	0.94	0.15	3.62	0.66	1.49	80%	0.30	1.05	75%
POLANE S Plus Polyurethane Enamel Flat Beige 102341	102341	Spray	12.68	22.80%	0.0%	22.8%	0.0%	77.20%	0.02000	8	2.89	2.89	0.46	11.10	2.03	1.72	80%	0.34	3.74	75%
37030 Black VOHAPS/Silica Free Zenthane MIL-DTL-53039E Type IX	102317	Spray	8.32	40.68%	3.7%	37.0%	4.3%	59.32%	0.00461	8	3.21	3.08	0.11	2.72	0.50	0.20	80%	0.04	5.19	75%
Genesis M 3.5 Low VOC Hardener	102336	Spray	8.78	33.20%	0.0%	33.2%	0.0%	66.80%	0.00000	8	2.91	2.91	0.00	0.00	0.00	0.00	80%	0.00	4.36	75%
Genesis M FPC UPS Brown	102321	Spray	8.14	46.10%	0.0%	46.1%	0.0%	53.90%	0.00009	8	3.75	3.75	0.00	0.06	0.01	0.00	80%	0.00	6.96	75%
Genesis M FPC White	102320	Spray	10.26	34.40%	0.00%	34.4%	0.00%	65.60%	0.00066	8	3.53	3.53	0.02	0.45	0.08	0.04	80%	0.01	5.38	75%
Genesis Standard Accelerator	102365	Spray	8.13	98.90%	0.00%	98.9%	0.00%	1.10%	0.00001	8	8.04	8.04	0.00	0.02	0.00	0.00	80%	0.00	730.96	75%
Green 383 34094 VOHAP Free Zenthane MIL-DTL-53039E Type IX	102327	Spray	9.36	34.20%	0.01%	34.2%	0.01%	65.80%	0.00000	8	3.20	3.20	0.00	0.00	0.00	0.00	80%	0.00	4.86	75%
Invirapoxy clear base	102333	Spray	11.63	24.11%	0.00%	24.1%	0.00%	75.89%	0.00001	8	2.80	2.80	0.00	0.01	0.00	0.00	80%	0.00	3.69	75%
Invirapoxy S/G Catalyst	102332	Spray	11.56	24.22%	0.00%	24.2%	0.00%	75.78%	0.00001	8	2.80	2.80	0.00	0.01	0.00	0.00	80%	0.00	3.69	75%
Lippert Black HS 2K	102326	Spray	8.67	41.15%	0.00%	41.2%	0.00%	58.85%	0.00005	8	3.57	3.57	0.00	0.03	0.01	0.00	80%	0.00	6.06	75%
N-9632A 65%Zinc Epoxy Primer	102314	Spray	16.73	17.93%	0.00%	17.9%	0.00%	82.07%	0.00010	8	3.00	3.00	0.00	0.06	0.01	0.01	80%	0.00	3.66	75%
Organic Zinc Rich, Single Component, Moisture Cure Primer	101797	Spray	21.36	18.63%	0.00%	18.6%	0.00%	81.37%	0.00034	8	3.98	3.98	0.01	0.26	0.05	0.05	80%	0.01	4.89	75%
Powercron 935 Black Electrocoat Touch-up Aerosol	102331	Spray	6.30	44.93%	0.00%	44.9%	0.00%	55.07%	0.00238	8	2.83	2.83	0.05	1.29	0.24	0.07	80%	0.01	5.14	75%
T-422 Reduced Hardener	101916	Spray	9.83	9.32%	0.00%	9.3%	0.00%	90.68%	0.00002	8	0.92	0.92	0.00	0.00	0.00	0.00	80%	0.00	1.01	75%
Tan 686A 33446 VHF 1.0 VOC Zenthane MIL-DTL-53039E Type IV	102337	Spray	11.17	43.92%	38.52%	5.4%	38.38%	56.08%	0.00002	8	0.98	0.60	0.00	0.00	0.00	0.00	80%	0.00	1.08	75%
Methyl N-Amyl Ketone SOLVENT	103490	Spray	6.76	100.00%	0.00%	100.00%	0.00%	0.00%	0.00281	8	6.76	6.76	0.15	3.65	0.67	0.00	80%	0.00	0.00	75%
subtotal															4.25	3.59	--	0.72		

Calculations received from Source, pursuant to SSM 039-39010-00498

METHODOLOGY

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

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	lb VOC/gal solids
Dowandl PPH Glycol Ether	8.8	100.00%	0.0%	100.0%	0.0%	0.00%	220.00000	8.80	8.80	0.97	N/A

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Application	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Powder Usage Rate (lb/square foot)	maximum square footage per hour	Transfer Efficiency	Uncontrolled PM (tons/yr)	Controlled PM (tons/yr)	Controlled PM (lb/hr)
RV Black 11	Spray	10.76	0.00%	0.341	3000	90.00%	448.1	45	10

METHODOLOGY

Uncontrolled emissions tons/yr = Powder Usage (lb/hr) * transfer efficiency * 8760 (hrs/yr)
controlled emissions tons/yr = Uncontrolled emissions tons/yr * filter efficiency (90%)

Appendix A: Emissions Calculations

HAPs

Surface Coating Operations

Company Name: Lippert Components
 Address City IN Zip: 2501 Jeanwood Drive, Elkhart, IN 46514
 Minor Source Modification No.: 039-43110-00498
 Significant Permit Modification No.: 039-43153-00498
 Reviewer: Hachem Ismail Alaoui

Material	SDS ID #	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % 2-Butoxyethyl acetate (CAS# 112-07-2)	Weight % Hexamethylene-1,6 diisocyanate (CAS# 822-06-0)	Weight % Cumene	Weight % Xylene	Ethyl Benzene Potential Emissions (ton/yr)	Ethyl Benzene Actual Emissions (ton/yr)	2-Butoxyethyl acetate Potential Emissions (ton/yr)	2-Butoxyethyl acetate Actual Emissions (ton/yr)	Hexamethylene-1,6 diisocyanate Potential Emissions (ton/yr)	Hexamethylene-1,6 diisocyanate Actual Emissions (ton/yr)	Cumene Potential Emissions (ton/yr)	Cumene Actual Emissions (ton/yr)	Xylene Potential Emissions (ton/yr)	Xylene Actual Emissions (ton/yr)
Epoxy and Acrylic electro coating operation																			
Acrylics (as supplied) - Powercron CR935 (Resin) - (No HAPs)	101985	8.7	5.67900	15.400						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Acrylics (as supplied) - Powercron 639J (Paste) - (No HAPs)	101984	9.5	4.87500	15.400						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Epoxy (as supplied) - Powercron 6000 - (No HAPs)	102350	9.1	1.88000	18.390						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Potential to Emit: (tons/yr) 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000
 Actual Emissions: (tons/yr) 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000

CARC1 Spray Booth

37030 Black.VOHAPS/Silica Free Zenthane MIL-DTL-53039E Type IX	102317	8.32	0.01383	30			0.5%			0.000	0.000	0.000	0.000	0.076	0.025	0.000	0.000	0.000	0.000
Genesis M 3.5 Low VOC Hardener	102336	8.78	0.0026	30		5.69%	0.13%			0.000	0.000	0.017	0.006	0.000	0.000	0.000	0.000	0.000	0.000
Genesis M FPC UPS Brown - (No HAPs)	102321	8.14	0.00198	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Genesis M FPC White (No HAPs)	102320	10.26	0.00198	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Genesis Standard Accelerator - (No HAPs)	102365	8.13	0.00003	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Green 383 34094 VOHAP Free Zenthane MIL-DTL-53039E Type IX	102327	9.36	0.00006	30			1%			0.000	0.000	0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000
Invirapoxy clear base - (No HAPs)	102333	11.63	0.00004	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Invirapoxy Si/G Catalyst - (No HAPs)	102332	11.56	0.00004	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Lippert Black HS 2K - (No HAPs)	102326	8.67	0.00015	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
N-9632A 65%Zinc Epoxy Primer - (No HAPs)	102314	16.73	0.00030	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Organic Zinc Rich, Single Component, Moisture Cure Primer	101797	21.36	0.00102	30	0.5%				3%	0.014	0.005	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.085
Powercron 935 Black Electocoat Touch-up Aerosol	102331	6.30	0.00715	30	2%				9%	0.118	0.039	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.532
T-422 Reduced Hardener - (No HAPs)	101916	9.83	0.00006	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Tan 686A 33446 VHF 1.0 VOC Zenthane MIL-DTL-53039E Type IV	102337	11.17	0.00006	30			1%			0.000	0.000	0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000
Methyl N-Amyl Ketone SOLVENT - (No HAPs)	103490	6.76	0.00030	30						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Potential to Emit: (tons/yr) 0.132 0.044 0.017 0.006 0.078 0.026 0.000 0.000 0.618 0.206
 Actual Emissions: (tons/yr) 0.132 0.044 0.017 0.006 0.078 0.026 0.000 0.000 0.618 0.206

CARC2 Spray Booth

POLANE Exterior Catalyst 102338	102338	9.44	0.02000	8.00			0.13%	0.3%		0.000	0.000	0.000	0.000	0.009	0.003	0.020	0.007	0.000	0.000
POLANE S Plus Polyurethane Enamel Flat Beige 102341 - (No HAPs)	102341	12.68	0.02000	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
37030 Black.VOHAPS/Silica Free Zenthane MIL-DTL-53039E Type IX	102317	8.32	0.00922	8.00			0.5%			0.000	0.000	0.000	0.000	0.013	0.004	0.000	0.000	0.000	0.000
Genesis M 3.5 Low VOC Hardener	102336	8.78	0.00018	8.00		5.69%	0.13%			0.000	0.000	0.003	0.001	0.000	0.000	0.000	0.000	0.000	0.000
Genesis M FPC UPS Brown - (No HAPs)	102321	8.14	0.00132	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Genesis M FPC White (No HAPs)	102320	10.26	0.00132	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Genesis Standard Accelerator - (No HAPs)	102365	8.13	0.00002	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Green 383 34094 VOHAP Free Zenthane MIL-DTL-53039E Type IX	102327	9.36	0.00004	8.00			1%			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Invirapoxy clear base - (No HAPs)	102333	11.63	0.00003	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Invirapoxy Si/G Catalyst - (No HAPs)	102332	11.56	0.00003	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Lippert Black HS 2K - (No HAPs)	102326	8.67	0.00010	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
N-9632A 65%Zinc Epoxy Primer - (No HAPs)	102314	16.73	0.00020	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Organic Zinc Rich, Single Component, Moisture Cure Primer	101797	21.36	0.00068	8.00	0.5%				3%	0.003	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.015
Powercron 935 Black Electocoat Touch-up Aerosol	102331	6.30	0.00476	8.00	2%				9%	0.021	0.007	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.095
T-422 Reduced Hardener - (No HAPs)	101916	9.83	0.00004	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Tan 686A 33446 VHF 1.0 VOC Zenthane MIL-DTL-53039E Type IV	102337	11.17	0.00004	8.00			1%			0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Methyl N-Amyl Ketone - (No HAPs)	103490	6.76	0.00562	8.00						0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Potential to Emit: (tons/yr) 0.024 0.008 0.003 0.001 0.022 0.007 0.020 0.007 0.110 0.037
 Actual Emissions: (tons/yr) 0.024 0.008 0.003 0.001 0.022 0.007 0.020 0.007 0.110 0.037

Solvents

Dowanol PPH Glycol Ether (No HAPs)

Calculations received from Source, pursuant to SSM 039-39010-00498

METHODOLOGY

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

HAPS actual emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 2000 hrs/yr / 1 ton/2000 lbs

Subtotal = Sum of all coatings + Sum of all solvents used

Actual Emissions - Based on 24 hrs/day - 5 days/week - 50 weeks/yr = 6,000 hrs

Epoxy and Acrylic electro coating operation

Potential Emissions - Highest Single HAP Tons: 0.000
 Potential Emissions - Total HAPS Tons: 0.000

Epoxy and Acrylic electro coating operation

Actual Emissions - Highest Single HAP Tons: 0.000
 Actual Emissions - Total HAPS Tons: 0.000

CARC1 Spray Booth

Potential Emissions - Highest Single HAP Tons: 0.618
 Potential Emissions - Total HAPS Tons: 0.845

CARC1 Spray Booth

Actual Emissions - Highest Single HAP Tons: 0.206
 Actual Emissions - Total HAPS Tons: 0.282

CARC2 Spray Booth

Potential Emissions - Highest Single HAP Tons: 0.110
 Potential Emissions - Total HAPS Tons: 0.179

CARC2 Spray Booth

Actual Emissions - Highest Single HAP Tons: 0.037
 Actual Emissions - Total HAPS Tons: 0.060

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

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Unit type	Unit ID	MMBtu/hr
E-coat cure oven	CO-1	1.9
E-coat burn-off oven	BOO-2	2.0
CARC1 bake/cure oven	BKO-1	3.5
PC-1 process heater	WH-1	2.5
PC-1 process heater	WH-2	2.5
PC-1 drying oven	DO-2	1.5
PC-1 bake/cure oven	BKO-2	1.6
PC-1 cure oven	CO-3	4.0
boiler	BO-1	7.0
boiler	BO-2	7.0
air handling units	Units 1-4	40.0
TOTAL:		73.5

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
73.5	1020	631.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.60	2.40	2.40	0.19	31.56	1.74	26.51

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	6.6E-04	3.8E-04	2.4E-02	0.57	1.1E-03	0.59

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.6E-04	3.5E-04	4.4E-04	1.2E-04	6.6E-04	1.7E-03
	Total HAPs					0.60
	Worst HAP					0.57

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.

Hexane

Appendix A: Emissions Calculations
LPG-Propane rosebud torch units (20)
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Heat Input Capacity MMBtu/hr 17.26	Potential Throughput kgals/year 1652.4	SO2 Emission factor = 0.10 x S S = Sulfur Content = 1.50 grains/100ft ³
--	--	---

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.2 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.17	0.58	0.58	0.12	10.74	0.83	6.20

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Calculations received from Source, pursuant to SSM 039-39010-00498

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

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

**Appendix A: Emissions Calculations
Welding and Thermal Cutting
Welding and Flame Cutting units**

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	150	0.59		0.0055	0.0005			0.487	0.044	0.000	0	0.044
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	25	0.25	145	0.0039				0.212	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.70	0.04	0.00	0.00	0.04
Potential Emissions lbs/day								16.77	1.06	0.00	0.00	1.06
Potential Emissions tons/year								3.06	0.19	0.00	0.00	0.19

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the

Using AWS average values: $(0.25 \text{ g/min}) / (3.6 \text{ m/min}) \times (0.0022 \text{ lb/g}) / (39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0.0039 \text{ lb}/1,000 \text{ in. cut, 8 mm thick}$

Plasma cutting emissions, lb/hr: $(\# \text{ of stations})(\text{max. cutting rate, in./min.})(60 \text{ min./hr.})(\text{emission factor, lb. pollutant}/1,000 \text{ in. cut, 8 mm thick})$

Cutting emissions, lb/hr: $(\# \text{ of stations})(\text{max. metal thickness, in.})(\text{max. cutting rate, in./min.})(60 \text{ min./hr.})(\text{emission factor, lb. pollutant}/1,000 \text{ in. cut, 1" thick})$

Welding emissions, lb/hr: $(\# \text{ of stations})(\text{max. lbs of electrode used/hr/station})(\text{emission factor, lb. pollutant}/\text{lb. of electrode used})$

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Final Finish Grinding**

Company Name: Lippert Components
Address City IN Zip: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

PM

Process	Process Weight Rate (lbs of steel/hr)	PM Emission Factor (lbs/ton)	Potential PM Emission Rate per Operation (lbs/hr)	Number of Operations	Potential to Emit (lbs/hr)	Potential to Emit (tons/yr)
Final finish Grinding	1.0	17	0.0085	30	0.255	1.12

PM10/PM2.5

Process	Process Weight Rate (lbs of steel/hr)	PM10 Emission Factor (lbs/ton)	Potential PM10 Emission Rate per Operation (lbs/hr)	Number of Operations	Potential to Emit (lbs/hr)	Potential to Emit (tons/yr)
Final finish Grinding	1.0	1.7	0.00085	30	0.026	0.11

Methodology

Emission factors are the emission factors for cleaning and finishing of castings, from AP-42, Ch. 12.10, SCC# 3-04-003-40.

This is the most similar process to metal working for which emission factors have been developed and approved.

Assume PM10 = PM2.5

**Appendix A: Emission Calculations
Abrasive Blasting - Flow Rate Known**

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	0.01

Potential to Emit Before Control			
FR = Flow rate of actual abrasive (lb/hr) =	130.00	lb/hr (per nozzle)*	
w = fraction of time of wet blasting =	0	%	
N = number of nozzles =	2		
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.860	lb PM10 / lb PM	
	PM	PM10	
Potential to Emit (before control) =	1.040	0.89	lb/hr
=	24.96	21.47	lb/day
=	4.56	3.92	ton/yr

Potential to Emit After Control			
	PM	PM10	
Emission Control Device Efficiency =	99.9%	99.9%	
Potential to Emit (after control) =	0.0010	0.0009	lb/hr
=	0.0250	0.0215	lb/day
=	0.0046	0.0039	ton/yr

* Flow rate provided by the source based on manufacturer's specifications.

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

326 IAC 6-3-2(e) Allowable Rate of Emissions

Shot Blast Unit SB-1	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Shot Blast Unit SB-1	24,260.00	12.130	21.826	95.597

Methodology

Process Rate = flow rate of abrasive + weight of substrate being blasted

Flow of abrasive = 130 lbs/hr * 2 nozzles = 260 lbs/hr

Number of chassis per hour*weight of a chassis = 1 chassis * 24,000lbs/chassis = 24,000lb/hr

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^{0.67}

**Appendix A: Emission Calculations
Abrasive Blasting - Flow Rate Known**

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	0.01

Potential to Emit Before Control			
FR = Flow rate of actual abrasive (lb/hr) =	130.00	lb/hr (per nozzle)*	
w = fraction of time of wet blasting =	0	%	
N = number of nozzles =	4		
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.860	lb PM10 / lb PM	
	PM	PM10	
Potential to Emit (before control) =	2.080	1.79	lb/hr
=	49.92	42.93	lb/day
=	9.11	7.83	ton/yr

Potential to Emit After Control			
Emission Control Device Efficiency =	99.9%	99.9%	
Potential to Emit (after control) =	0.0021	0.0018	lb/hr
=	0.0499	0.0429	lb/day
=	0.0091	0.0078	ton/yr

* Flow rate provided by the source based on manufacturer's specifications.

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
 Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

326 IAC 6-3-2(e) Allowable Rate of Emissions

Shot Blast Unit SB-2	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Shot Blast Unit SB-2	520.00	0.26	1.66	7.28

Methodology

Process Rate = flow rate of abrasive
 Flow of abrasive = 130 lbs/hr * 4 nozzles = 520 lbs/hr

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^{0.67}

Appendix A: Emission Calculations
Degreasing Operations - Part Washer

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Unit ID	Unit Description	Product Manufacturer	Product Name	Number of Cold Cleaner Degreaser Units	Net Product Usage per Degreaser (gal/day)	Total Product Usage (gal/day)	Density (lb/gal)	Product VOC (lb/gal)	Average VOC Emissions (lb/hr)	VOC Emissions (lb/day)	VOC Emissions (tons/yr)
CC1	Oscillating Cold Solvent Washer	Beaver Research Company	S-722	1	0.05	0.05	7.00	0.45	0.001	0.02	0.004
Totals:				1	--	0.05	--	--	0.001	0.02	0.004

Methodology:

Potential to Emit VOC (tons/yr) = [VOC density (lb/gal) * Material Usage (gal/day)] * 365days/yr * 1 ton/2000 lbs

Potential to Emit VOC (lb/day) = [VOC density (lb/gal) * Material Usage (gal/day)]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Lippert Components
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Minor Source Modification No.: 039-43110-00498
Significant Permit Modification No.: 039-43153-00498
Reviewer: Hachem Ismaili Alaoui

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	6.0	24.0	26.7	640.8	634	0.120	2.9	1051.2
Vehicle (leaving plant) (one-way trip)	4.0	6.0	24.0	26.7	640.8	634	0.120	2.9	1051.2
Totals			48.0		1281.6			5.8	2102.4

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

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	26.7	26.7	26.7	tons = average vehicle weight (provided by source)
sL =	1.5	1.5	1.5	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.454	0.091	0.0223	lb/mile
Mitigated Emission Factor, Eext =	0.415	0.083	0.0204	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.22	0.04	0.01	0.22	0.04	0.01
Vehicle (leaving plant) (one-way trip)	0.22	0.04	0.01	0.22	0.04	0.01
Totals	0.44	0.09	0.02	0.44	0.09	0.02

Methodology

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

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 13, 2020

Ricky Seward
Lippert Components, Inc. - Plant 72
2501 Jeanwood Drive
Elkhart, IN 46514

Re: Public Notice
Lippert Components, Inc. - Plant 72
Permit Level: Title V-Significant Permit Modification
Permit Number: 039-43153-00498

Dear Mr. Ricky Seward:

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

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

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

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43153

and

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

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

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

OAQ has submitted the draft permit package to the Elkhart Public Library, 3429 East Bristol Street in Elkhart, IN 46514. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Hachem Ismaili Alaoui, 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 2-2827 or dial (317) 232-2827.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

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



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October 13, 2020

To: Elkhart 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. – Plant 72
Permit Number: 039-43153-00498

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

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

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

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

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

Enclosures
PN Library updated 4/2019



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Notice of Public Comment

October 13, 2020
Lippert Components, Inc. – Plant 72
039-43153-00498

Dear Concerned Citizen(s):

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

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

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

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

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

Enclosure
PN AAA Cover Letter 2/28/2020



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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

October 13, 2020

A 30-day public comment period has been initiated for:

Permit Number: 039-43153-00498
Applicant Name: Lippert Components, Inc. – Plant 72
Location: Elkhart, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	KBOURQUE 10/13/2020 Lippert Components LLC Plant 72 039-43153-00498 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Ricky Seward Lippert Components LLC Plant 72 2501 Jeanwood Dr Elkhart IN 46514 (Source CAATS)										
2		Joe Thompson General Manager Lippert Components LLC Plant 72 2501 Jeanwood Dr Elkhart IN 46514 (RO CAATS)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
6		Elkhart Public Library - Osolo Branch 3429 E Bristol St Elkhart IN 46514 (Library)										
7		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)										
8		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)										
9												
10												
11												
12												
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15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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