



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Northern Regional Office • 300 N. Dr. Martin Luther King Jr. Blvd, Suite 211 • South Bend, IN 46601-1295

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 23, 2024

VIA ELECTRONIC MAIL

Tim Stickler
Lippert Components, Inc.-Plant 46
3625 N. SR 9
Howe, Indiana 46746
tstickler@lci1.com

Re: Inspection Summary/Violation Letter
Lippert Components, Inc.-Plant 46
Source ID 087-00084
Howe, LaGrange County

Dear Tim Stickler:

On July 22, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Lippert Components, Inc.-Plant 46, located at 3625 N. SR 9 in Howe, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: Violations were observed

At the time of the inspection, the following violations were noted:

- 1) According to Permit No. 46542, Condition D.1.11(b) Record Keeping Requirements, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

Lippert Components, Inc.-Plant 46 failed to maintain records of daily filter inspections for 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly overspray observations for the weeks of 9/01/2022 and 9/12/2022, and monthly rooftop and ground observations for September 2022.

- 2) According to Permit No. 46542, Condition D.1.10 Monitoring, daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operation, identified as EU-01, while in operation. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

Lippert Components, Inc.-Plant 46 failed to conduct daily monitoring from 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly monitoring for the weeks of 9/01/2022 and 9/12/2022, and monthly monitoring for September 2022 in violation of Permit No. 46542, Condition D.1.10 Monitoring.

The Office of Air Quality will not take legal action at this time. However, any such violation(s) in the future may result in legal action being pursued. Please direct any questions to John Alexander, Compliance Inspector, at 574-261-4003 or by email at jealexan@idem.in.gov. Thank you for your attention to this matter.

Sincerely,



for

James E. Weingart, Director
Northern Regional Office
Office of Air Quality

ACES ID: 299800

ENCLOSURE

cc: John Alexander, Compliance and Enforcement Branch, Office of Air Quality
LaGrange County Health Department

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



SOURCE INFORMATION	
SOURCE NAME	Lippert Components, Inc.-Plant 46
SOURCE LOCATION	3625 N. SR 9, Howe, Indiana LaGrange County
MAILING ADDRESS	3625 N. SR 9, Howe, Indiana 46746
PLANT ID	087-00084
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 46542 Permit Expiration Date: 9/20/2027 VFC Document No.(hyperlink): 83479021
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The Permittee owns and operates a stationary RV and mobile home chassis fabrication and coating plant.

INSPECTION INFORMATION			
INSPECTED BY	John Alexander		
INSPECTION DATE AND TIME	July 22, 2024	TIME IN: 8:40 am	TIME OUT: 9:30 am
REPORTED BY	John Alexander	REPORT DATE: 7/22/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	August 2019 to July 22, 2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:	<input type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance	
ACES TRACKING NUMBER(S)	Inspection: 299800	Complaint:	Violation/Warning: 299801
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	The most recent compliance inspection was conducted on February 19, 2019. No violations were observed.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Mert Wiley	Production Manager	574-361-1011	mwiley@lci1.com
Tim Stickler	Corporate Environmental Director	260-579-1190	tstickler@lci1.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
N/A			

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
N/A			
Formal Enforcement Actions			
<i>Case Number</i>	<i>Enforcement Type</i>	<i>Civil Penalty</i>	<i>Describe Violation(s)</i>
N/A		\$	
Other Relevant Actions			
<i>Action Taken</i>	<i>Comments</i>		
N/A			

PERMIT SECTION D.1		
Emission Units and Control Devices:		
Emissions Unit Description:		
(a)	One (1) Surface Coating Operation, identified as EU-01, approved for construction in 2012, using air assisted spray guns to apply to a steel substrate with a maximum capacity of:	
(1)	Thirty-five (35) RV chassis per hour (14,000 lbs of steel per hour) and 52.5 gallons of coating per hour, and	
(2)	Twelve (12) mobile home chassis per hour and 78.0 gallons of coating per hour, using dry filters as control, and exhausting to stack S-1.	
Insignificant Activities:		
(a)	Space heaters, process heaters, or boilers using natural gas combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:	
(4)	One (1) natural gas-fired water heater, identified as H21, approved for construction in 2012, rated at 0.05 MMBtu/hr, exhausting outside.	
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
• 326 IAC 8-2-9, 326 IAC 6-2-4, 326 IAC 6-3-2		
Requirement	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Types of Records Reviewed: VOC, SDS, Daily filter inspections, weekly overspray observations, monthly rooftop and ground observations		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		

PERMIT SECTION D.1

Upon arrival at Lippert Components, Inc.-Plant 46, I was introduced to Mert Wiley, Production Manager. The plant was operating, and I did not observe any opacity coming from the building.

IDEM is aware that the surface coating operation (EU-01) has been modified prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action.

During the records review, it was discovered that daily filter records were missing for 9/01/2022-9/03/2022 and 9/13/2022-9/22/2022, weekly overspray observations were missing for the weeks of 9/01/2022 and 9/12/2022, and monthly rooftop and ground observations were missing for September 2022. Mr. Wiley stated that he must have been out during those times, and he is the only person responsible for the monitoring and record keeping. I suggested that he train a backup person for the times when he is away from the plant.

I reviewed the Preventive Maintenance Plan and it complied with 326 IAC 1-6-3.

According to the SDS, Lippert Components, Inc.-Plant 46 used compliant coatings with VOC content less than the 3.5 lbs/gal limit. I reviewed the VOC usage records and verified that the VOC input complied with the permit limit.

<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
Dry filters	Properly installed	N/A	Properly installed

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:
 - 1) Lippert Components, Inc.-Plant 46 failed to maintain records of daily filter inspections for 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly overspray observations for the weeks of 9/01/2022 and 9/12/2022, and monthly rooftop and ground observations for September 2022, in violation of Permit No. 46542, Condition D.1.11, Record Keeping.
 - 2) Lippert Components, Inc.-Plant 46 failed to conduct daily monitoring from 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly monitoring for the weeks of 9/01/2022 and 9/12/2022, and monthly monitoring for September 2022 in violation of Permit No. 46542, Condition D.1.10 Monitoring.

ADDITIONAL SOURCE COMPLIANCE REVIEW:

The following reports are required and were reviewed:

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

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

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

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

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

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

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

Additional Information and Comments:

It was suggested to Mr. Wiley that a backup responsible person be trained to conduct daily, weekly, and monthly monitoring and that the person be trained to record their observations for times when he is away from the plant.

Additional Source Compliance Review Status:

ADDITIONAL SOURCE COMPLIANCE REVIEW:

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

INSPECTION FINDINGS

- No violations were observed or determined at the time of the inspection.
- The following violations were determined at the time of the inspection:
 - 1) Lippert Components, Inc.-Plant 46 failed to maintain records of daily filter inspections for 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly overspray observations for the weeks of 9/01/2022 and 9/12/2022, and monthly rooftop and ground observations for September 2022.
 - 2) Lippert Components, Inc.-Plant 46 failed to conduct daily monitoring from 9/01/2022-9/03/2022 and 9/13/2022-9/21/2022, weekly monitoring for the weeks of 9/01/2022 and 9/12/2022, and monthly monitoring for September 2022 in violation of Permit No. 46542, Condition D.1.10 Monitoring.

RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mert Wiley prior to exiting the facility and through email with Tim Stickler after exiting the facility.

ATTACHMENTS

- None.