



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Lippert Components, Inc., Plant 46 in Lagrange County

Significant Permit Revision No.: 087-47811-00084

The Indiana Department of Environmental Management (IDEM) has received an application from Lippert Components, Inc., Plant 46, located at 3625 N. State Road 9, Howe, Indiana 46746, for a significant revision of its FESOP issued on September 20, 2017. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Lippert Components, Inc., Plant 46 to make certain changes at its existing source. Lippert Components, Inc., Plant 46 has applied to change surface coating materials used and increase the maximum usage at an existing surface coating operation.

The applicant intends to modify emissions units 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). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. 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:

LaGrange County Public Library – Main Branch
203 W. Spring Street
LaGrange, IN 46761

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: <https://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

This notice is posted on IDEM's website (<https://www.in.gov/idem/public-notices/>). The date that this notice is posted on IDEM's website 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 IDEM decides to conduct a public hearing and/or public meeting, IDEM will post a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (<https://www.in.gov/idem/public-notices/>). 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 SPR 087-47811-00084 in all correspondence.

Comments should be sent to:

Tori Tamburrino
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Tori Tamburrino or (317) 233-0043
Or dial directly: (317) 233-0043
Fax: (317) 232-6749 attn: Tori Tamburrino
E-mail: vtamburr@idem.IN.gov

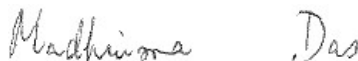
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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 Tori Tamburrino of my staff at the above address.



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



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Eric J. Holcomb
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Brian C. Rockensuess
Commissioner

Mr. Tim Stickler
Lippert Components, Inc., Plant 46
3501 County Road 6
Elkhart, IN 46514

Re: 087-47811-00084
Significant Revision to
F087-37915-00084

Dear Mr. Stickler:

Lippert Components, Inc., Plant 46 was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F087-37915-00084, on September 20, 2017, for a stationary RV and mobile home chassis fabrication and coating plant located at 3625 N. State Road 9, Howe, Indiana 46746. On May 6, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to change the surface coating materials used and the maximum usage at the existing surface coating operation. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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

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If you have any questions regarding this matter, please contact Tori Tamburrino, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0043 or (800) 451-6027, and ask for Tori Tamburrino or (317) 233-0043.

Sincerely,

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

Attachments: Revised permit and Technical Support Document.

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Lippert Components, Inc., Plant 46
3625 N. State Road 9
Howe, Indiana 46746**

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(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. 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 2-8 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: 087-37915-00084	
Master AI No.12578	
Original Signed By: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2017 Expiration Date: September 20, 2027

FESOP Administrative Amendment No. 087-46542-00084, issued on May 22, 2023.

Significant Permit Revision No.: 087-47811-00084	
Issued By: Madhurima D Moulik Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: September 20, 2027

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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 2-8-3(b)]

The Permittee owns and operates a stationary RV and mobile home chassis fabrication and coating plant.

Source Address:	3625 N. State Road 9, Howe, Indiana 46746
General Source Phone Number:	574-312-6440
SIC Code:	3441 (Fabricated Structural Metal)
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Surface Coating Operation, identified as EU-01, constructed in 2012, modified in 2024 to change surface coating materials and increase the maximum usage of surface coating materials, using air assisted spray guns to apply coating to a steel substrate with a maximum capacity of:
 - (1) Twelve (12) RV chassis per hour (4,800 lbs of steel per hour) and 90.0 gallons of coating per hour, and
 - (2) Twelve (12) mobile home chassis per hour and 90.0 gallons of coating per hour, using dry filters as control, and exhausting to stack S-1.
- (b) One (1) welding and assembly area, identified as EU-02, constructed in 2012, with a maximum capacity of 35 RV chassis and 12 mobile home chassis per hour and consisting of:
 - (1) Eighty (80) MIG welders, each consuming two pounds of electrode per hour.
 - (2) Eight (8) natural gas-fired "rosebud" torches rated at 0.15 MMBtu/hr each.
- (c) One (1) steel cutting area, identified as EU-03, constructed in 2012, with a maximum capacity of 14,000 lbs of steel per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following 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:

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- (1) Eighteen (18) natural gas-fired radiant space heaters, identified as H1 through H18, constructed in 2012, rated at 0.08 MMBtu/hr each, exhausting outside.
 - (2) One (1) natural gas-fired radiant space heater, identified as H19, constructed in 2012, rated at 0.15 MMBtu/hr, exhausting outside.
 - (3) One (1) natural gas-fired air make up unit, identified as H20, constructed in 2012, rated at 2.20 MMBtu/hr, exhausting outside.
 - (4) One (1) natural gas-fired water heater, identified as H21, constructed in 2012, rated at 0.05 MMBtu/hr, exhausting outside.
 - (5) One (1) natural gas-fired air make up unit, associated with the surface coating booth EU-1, constructed in 2012, rated at 5.6 MMBtu/hr, exhausting outside.
- (b) Emission units not regulated by a NESHAP, with potential uncontrolled emissions are equal to one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs. Emissions are negligible.
 - (c) Hot-water production for on-site personal use not related to any industrial or production process.
 - (d) Portable electrical generators that can be moved by hand from one location to another.
 - (e) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste.
 - (f) Air vents from air compressors.
 - (g) Brazing, soldering, or welding operations and associated equipment. Emissions are negligible.
 - (h) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations. Emissions are negligible.
 - (i) Pressurized storage tanks and associated piping for: acetylene, liquid petroleum gas (LPG).
 - (j) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP. Emissions are negligible.
 - (k) Storage of drums containing maintenance raw materials. Emissions are negligible.
 - (l) Air compressors and pneumatically operated equipment including hand tools. Emissions are negligible.
 - (m) Compressor or pump lubrication and seal oil systems. Emissions are negligible.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

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SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 087-37915-00084, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [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 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

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- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 July 1 of each year to:

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

- (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 2-8-4(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.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 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

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to 087-37915-00084 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

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(3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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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

- (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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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);

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- (4) The Permittee notifies the:

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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

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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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.

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Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (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
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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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- (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.14 Risk Management Plan [326 IAC 2-8-4] [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.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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

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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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 FESOP.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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- (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) Surface Coating Operation, identified as EU-01, constructed in 2012, modified in 2024 to change surface coating materials and increase the maximum usage of surface coating materials, using air assisted spray guns to apply coating to a steel substrate with a maximum capacity of:
- (1) Twelve (12) RV chassis per hour (4,800 lbs of steel per hour) and 90.0 gallons of coating per hour, and
 - (2) Twelve (12) mobile home chassis per hour and 90.0 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, constructed 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.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PSD [326 IAC 2-2] and FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70) and 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, to the surface coating operation (EU-01) shall not exceed 98.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding the insignificant activities.
- (b) The dry filters for PM, PM10, and PM2.5 shall be in operation and control emissions from the surface coating operation (EU-01) at all times the surface coating operation (EU-01) is in operation.

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5 and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, PM2.5, and VOC 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.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), for the surface coating operation, identified as EU-01, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators.

D.1.3 Volatile Organic Compounds (VOC) Work Practices [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), 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:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) 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.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning 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.1.4 Particulate Matter Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the natural gas-fired water heater, identified as H21, shall be limited to 0.6 pounds per MMBtu heat input.

D.1.5 Particulate Emission Limitations, Work Practices, and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating operation, identified as EU-01, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.

Compliance Determination Requirements

D.1.7 VOC Emissions

Compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total VOC usage for the most recent twelve (12) month period.

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D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2(a)] [326 IAC 8-1-4(a)(3)]

Compliance with the VOC content contained in Conditions D.1.1, D.1.2 and D.1.3, 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 Particulate Control

In order to comply with conditions D.1.1(b) and D.1.5, the dry filters for particulate control shall be in operation at all times the surface coating operation, identified as EU-01 is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

- (a) 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. The Response to Excursions or Exceedances Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1(a), D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.1(a) and the VOC content limit contained in Condition D.1.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC input for each month; and
 - (5) The total VOC input for each compliance period.
- (b) To document the compliance status with Condition D.1.10, the Permittee shall maintain:
 - (1) A log of weekly overspray observations, daily and monthly inspections.

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

D.1.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than (30) days after the end of the quarter period being reported. Section C - General Reporting 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, Indiana 46746
FESOP Permit No.: 087-37915-00084

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:

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, Indiana 46746
FESOP Permit No.: 087-37915-00084

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <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 2-8-12 |
|--|

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 Describe:
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**

FESOP Quarterly Report

Source Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, Indiana 46746
FESOP Permit No.: 087-37915-00084
Facility: Surface Coating Operation, identified as EU-01
Parameter: VOC Inputs
Limit: shall not exceed 98.9 tons per twelve (12) consecutive month period

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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, Indiana 46746
FESOP Permit No.: 087-37915-00084

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 Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Description and Location

Source Name:	Lippert Components, Inc., Plant 46
Source Location:	3625 N. State Road 9, Howe, IN 46746
County:	LaGrange (Bloomfield Township)
SIC Code:	3441 (Fabricated Structural Metal)
Operation Permit No.:	F 087-37915-00084
Operation Permit Issuance Date:	September 20, 2017
Significant Permit Revision No.:	087-47811-00084
Permit Reviewer:	Tori Tamburrino

Existing Approvals

The source was issued FESOP Renewal No. F 087-37915-00084 on September 20, 2017. The source has since received the following approval:

- (a) FESOP Administrative Amendment No. 087-46542-00084, issued on May 22, 2023.

County Attainment Status

The source is located in LaGrange County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

326 IAC 1-4-45 LaGrange County

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 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. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 LaGrange 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 of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 LaGrange 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 revision, 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 Revision (ton/year)								Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	
Total PTE of Entire Source Excluding Fugitive Emissions*	36.22	36.48	36.48	0.03	4.57	99.15	3.84	0.23	0.32

	Source-Wide Emissions Prior to Revision (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 is manganese.
 *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 FESOP Renewal No. 087-37915-00084, issued on September 20, 2017.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lippert Components, Inc., Plant 46 on May 6, 2024, relating to a request for approval to change the type of surface coating materials used and increase the usage of coating materials at an existing permitted surface coating operation. The PTE of PM, PM10, PM2.5, and VOC have increased as a result of this change.

The following is a list of the modified emission units and pollution control device(s) (**bold** to show additions and ~~strike through~~ to show deletions):

- (a) One (1) Surface Coating Operation, identified as EU-01, ~~approved for construction~~ **constructed** in 2012, **modified in 2024 to change surface coating materials and increase the maximum usage of surface coating materials**, using air assisted spray guns to apply coating to a steel substrate with a maximum capacity of:
 - (1) **Twelve (12)** ~~Thirty five (35)~~ RV chassis per hour (**4,800 lbs of steel per hour**) ~~(14,000 lbs of steel per hour)~~ and **90.0** ~~52.5~~ gallons of coating per hour, and
 - (2) Twelve (12) mobile home chassis per hour and **90.0** ~~78.0~~ gallons of coating per hour, using dry filters as control, and exhausting to stack S-1.

Enforcement Issues

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. This proposed approval is intended to satisfy the requirements of the construction permit and/or operating rules.

Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

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 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. 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 Increase of the Modified Emission Unit(s)/Process(es) (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
PTE Before Modification (Surface Coating)	614.90	614.90	614.90	0.00	0.00	285.32	0.00	0.00	0.00
PTE After Modification (Surface Coating)	719.42	719.42	719.42	0.00	0.00	788.40	0.00	0.00	0.00
<i>PTE Increase (Surface Coating)</i>	<i>104.52</i>	<i>104.52</i>	<i>104.52</i>	<i>0.00</i>	<i>0.00</i>	<i>503.08</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
Total PTE Increase of the Modified Emission Unit(s)/Process	104.52	104.52	104.52	0.00	0.00	503.08	0.00	0.00	0.00

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

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves a change in operation, where the potential to emit of any pollutant increases as indicated below with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

- (i) PM, PM₁₀, and/or direct PM_{2.5}.
- (ii) Volatile Organic Compounds (VOC).

PTE of the Entire Source After Issuance of the FESOP Revision

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 revision, 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*	41.44	41.70	47.70	0.03	4.57	99.15	3.84	0.23	0.32
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	--	--
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP is manganese. *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM, PM10, PM2.5, and VOC limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 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) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are still not included in the permit for this source, because this source is not an automobile or light-duty truck assembly plant.
- (b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85 are still not included in the permit for this source, since the source does not coat automobiles or light duty trucks as defined in § 63.3176.

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm and 326 IAC 20-80 are still not included in the permit for this source, since this source is not a major source of HAPs as defined in § 63.2.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart Pppp and 326 IAC 20-81 are still not included in the permit for this source, since this source does not coat plastic parts and is not a major source of HAPs as defined in § 63.2.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating, 40 CFR 63, Subpart HHHHHH are still not included in the permit for this source, since this source does not conduct any autobody refinishing operations, does not perform paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations, and does not use coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX are still not included in the permit for this source, since this source is not primarily engaged in the operations listed in one of the nine metal fabrication and finishing source categories, as defined in § 63.11514 and § 63.11522.
- (f) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD) and 326 IAC 2-8-4 (FESOP)

PSD and FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

PSD Minor Source Limit(s)

Source will continue to maintain its FESOP status and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. The current FESOP and PSD minor source limits have been revised as follows (in ~~strike through~~ to show deletion and in **bold** to show addition:

- (a) The total VOC input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operation (EU-01) shall not exceed 98.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding the insignificant activities.
- (b) **The dry filters for PM, PM10, and PM2.5 shall be in operation and control emissions from the surface coating operation (EU-01) at all times the surface coating operation (EU-01) is in operation.**

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5 and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, PM2.5, and VOC 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.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

[*Note: PSD and FESOP PM, PM10, and PM2.5 limits were added to the permit since they were inadvertently not included in the last approval.]

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

The modified emission unit(s) 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 not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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 LaGrange 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 LaGrange 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 LaGrange 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 the proposed revision, state rule applicability has been reviewed as follows:

Surface Coating Operation (EU-01)

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 still applicable to the surface coating operation, 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).

Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The surface coating operation is not subject to the requirements of 326 IAC 8-1-6 because it is regulated by other rules in 326 IAC 8. The surface coating operation is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations).

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

- (a) Pursuant to 326 IAC 8-2-1(a)(4) and 326 IAC 8-2-9(a), the surface coating operation is subject to the requirements of 326 IAC 8-2-9, since it was constructed in 2012, located in Lagrange County, and has the unlimited PTE of VOC equal to or greater than fifteen (15) pounds of VOC per day, and this source performs miscellaneous metal surface coating with SIC code 3441, which is included in SIC major group #34.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operation shall be not exceed three and five-tenths (3.5) pounds of VOC per gallon of coating less water.

- (b) This surface coating operation is also subject to the work practices specified under 326 IAC 8-2-9(f).
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning 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.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

The requirements of 326 IAC 8-10 still do not apply to the surface coating operation, because even though this source fabricates and coats RV and mobile home chassis, which is considered a vehicle part, these parts are not considered after-market parts or original equipment that have not been sold to consumers.

Compliance Determination and Monitoring Requirements

- (a) The Compliance Determination Requirements applicable to this revision are as follows:
- (1) Compliance with the VOC content 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.
 - (2) The dry filters for particulate control shall be in operation at all times the surface coating operation, identified as EU-01 is in operation.

Testing Requirements:

IDEM OAQ has determined that testing is not required at this time to determine compliance with the PM, PM10, PM2.5, and VOC 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 revision are as follows:

Control Device	Type of Monitoring	Frequency	Range or Specification
Dry Filters for Surface Coating (EU-01)	Dry Filter Inspections	Daily	Verify the placement, integrity and particle loading of the filters
	Observations for stack overspray	Weekly	Verify if there is an overspray condition that should result in a response
	Inspections for stack emissions and presence of overspray	Monthly	Verify if there is a noticeable change in overspray emissions or evidence of overspray

These monitoring conditions are necessary because the dry filters for the surface coating operation (EU-01) must operate properly to assure compliance with IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Sections A.2, A.3, and D.1 have been revised to incorporate the changes to the modified surface coating operation EU-01 and for clarification purposes.
- (2) Condition D.1.1 - PSD [326 IAC 2-2] and FESOP Limits [326 IAC 2-8-4] was revised in order to include the PSD and FESOP PM, PM10, and PM2.5 limits, which were inadvertently not included in the previous approval.

...
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Surface Coating Operation, identified as EU-01, ~~approved for construction~~ **constructed** in 2012, **modified in 2024 to change surface coating materials and increase the maximum usage of surface coating materials**, using air assisted spray

guns to apply coating to a steel substrate with a maximum capacity of:

- (1) **Twelve (12)** ~~Thirty-five (35)~~ RV chassis per hour **(4,800 lbs of steel per hour)** ~~(14,000 lbs of steel per hour)~~ and **90.0** ~~52.5~~ gallons of coating per hour, and
- (2) Twelve (12) mobile home chassis per hour and **90.0** ~~78.0~~ gallons of coating per hour,

using dry filters as control, and exhausting to stack S-1.

- (b) One (1) welding and assembly area, identified as EU-02, ~~approved for construction~~ **constructed** in 2012, with a maximum capacity of 35 RV chassis and 12 mobile home chassis per hour and consisting of:
...
- (c) One (1) steel cutting area, identified as EU-03, ~~approved for construction~~ **constructed** in 2012, with a maximum capacity of 14,000 lbs of steel per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- ...
- (1) Eighteen (18) natural gas-fired radiant space heaters, identified as H1 through H18, ~~approved for construction~~ **constructed** in 2012, rated at 0.08 MMBtu/hr each, exhausting outside.
 - (2) One (1) natural gas-fired radiant space heater, identified as H19, ~~approved for construction~~ **constructed** in 2012, rated at 0.15 MMBtu/hr, exhausting outside.
 - (3) One (1) natural gas-fired air make up unit, identified as H20, ~~approved for construction~~ **constructed** in 2012, rated at 2.20 MMBtu/hr, exhausting outside.
 - (4) One (1) natural gas-fired water heater, identified as H21, ~~approved for construction~~ **constructed** in 2012, rated at 0.05 MMBtu/hr, exhausting outside.
 - (5) One (1) natural gas-fired air make up unit, associated with the surface coating booth EU-1, ~~approved for construction~~ **constructed** in 2012, rated at 5.6 MMBtu/hr, exhausting outside.
- ...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Surface Coating Operation, identified as EU-01, ~~approved for construction~~ **constructed** in 2012, **modified in 2024 to change surface coating materials and increase the maximum usage of surface coating materials**, using air assisted spray guns to apply coating to a steel substrate with a maximum capacity of:
 - (1) **Twelve (12)** ~~Thirty-five (35)~~ RV chassis per hour **(4,800 lbs of steel per hour)** ~~(14,000 lbs of steel per hour)~~ and **90.0** ~~52.5~~ gallons of coating per hour, and
 - (2) Twelve (12) mobile home chassis per hour and **90.0** ~~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~~ **constructed** 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.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PSD [326 IAC 2-2] and FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70) and **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, to the surface coating operation (EU-01) shall not exceed 98.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding the insignificant activities.
- (b) **The dry filters for PM, PM10, and PM2.5 shall be in operation and control emissions from the surface coating operation (EU-01) at all times the surface coating operation (EU-01) is in operation.**

Compliance with this limit, combined with the potential to emit **PM, PM10, PM2.5, and VOC** emissions from all other emission units at this source, shall limit the source-wide total potential to emit of **PM, PM10, PM2.5, and VOC** to less than ~~400-250 tons per year~~ **twelve (12) consecutive month period**, and shall render the requirements of ~~326 IAC 2-7 (Part 70 Permits)~~ and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

...
D.1.7 VOC Emissions

Compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total VOC usage for the most recent twelve (12) month period.

...
D.1.9 Particulate Control

In order to comply with conditions **D.1.1(b)** and D.1.5, the dry filters for particulate control shall be in operation at all times the surface coating operation, identified as EU-01 is in operation.

...
D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1(a), D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.1(a) and the VOC content limit contained in Condition D.1.2.

...

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) The SIC code was revised as requested by Permittee. This source is a stationary RV and mobile home chassis fabrication and coating plant, which is classified under SIC code 3441 (Fabricated Structural Metal). The SIC code 3711 (Motor Vehicles and Passenger Car Bodies) has been removed from the permit, because the source does not manufacture or assemble complete passenger automobiles, trucks, commercial cars and buses, and special purpose motor vehicles which are for highway use.

...

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary RV and mobile home chassis fabrication and coating plant.

Source Address:	3625 N. State Route 9, Howe, Indiana 46746
General Source Phone Number:	574-312-6440
SIC Code:	3711-3441 (Fabricated Structural Metal)
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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

...

- (2) The FESOP Quarterly Report form was revised to include the unit of measurement in the table for clarity.

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

FESOP Quarterly Report

Source Name:	Lippert Components, Inc., Plant 46
Source Address:	3625 N. State Route 9, Howe, Indiana 46746
FESOP Permit No.:	087-37915-00084
Facility:	Surface Coating Operation, identified as EU-01
Parameter:	VOC Inputs
Limit:	shall not exceed 98.9 tons per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

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

...

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 May 6, 2024.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 087-47811-00084. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Tori Tamburrino, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0043 or (800) 451-6027, and ask for Tori Tamburrino or (317) 233-0043.
- (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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, IN 46746
Operating Permit Number: F087-37915-00084
Revision No.: 087-47811-00084
Reviewer: Tori Tamburrino**

Process/Emission Unit	Unlimited/Uncontrolled Potential to Emit									
	Tons per Year									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP	HAP Name
Surface Coating (EU-01)	719.42	719.42	719.42	0.00	0.00	788.40	0.00	0.00	0.00	--
Welding/Cutting	5.38	5.38	5.38	0.00	0.00	0.00	0.00	0.23	0.23	Manganese
Natural Gas Combustion	0.09	0.35	0.35	0.03	4.57	0.25	3.84	0.09	0.08	Hexane
Insignificant Activities	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	--
Total:	724.89	725.15	725.15	0.03	4.57	788.65	3.84	0.32	0.23	Manganese

Process/Emission Unit	Limited Potential to Emit									
	Tons per Year									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP	HAP Name
Surface Coating (EU-01)*	35.97	35.97	35.97	0.00	0.00	98.90	0.00	0.00	0.00	--
Welding/Cutting	5.38	5.38	5.38	0.00	0.00	0.00	0.00	0.23	0.23	Manganese
Natural Gas Combustion	0.09	0.35	0.35	0.03	4.57	0.25	3.84	0.09	0.08	Hexane
Total:	41.44	41.70	41.70	0.03	4.57	99.15	3.84	0.32	0.23	Manganese

*Pursuant to 326 IAC 6-3-2(d), the source is required to control particulate matter emissions using a dry filter. Therefore, the limited potential to emit PM, PM10, and PM2.5 is after control.

**Appendix A: Emission Calculations
Modification Summary**

Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, IN 46746
Permit Number: F087-37915-00084
Revision No.: 087-47811-00084
Reviewer: Tori Tamburrino

Uncontrolled PTE of Each Emissions Unit Prior to the Modification (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO	Total HAPs
Surface Coating	614.90	614.90	614.90	0.00	0.00	285.32	0.00	0.00

*These emissions are based on the TSD of FESOP Renewal No. F087-37915-00084, issued on September 20, 2017.

Uncontrolled PTE of Each Emissions Unit After the Modification (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO	Total HAPs
Surface Coating	719.42	719.42	719.42	0.00	0.00	788.40	0.00	0.00

Uncontrolled PTE Increased of the Modification (tons/yr) (Sum of the PTE Increased of Each Emisison Unit)								
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO	Total HAPs
Surface Coating	104.52	104.52	104.52	0.00	0.00	503.08	0.00	0.00
Total PTE Increase of Modification:	104.52	104.52	104.52	0.00	0.00	503.08	0.00	0.00

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

**Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, IN 46746
Operating Permit No.: F087-37915-00084
Revision No.: 087-47811-00084
Reviewer: Tori Tamburrino**

Material	Density (lbs/gal)	Weight % Volatile (water, VOC, and exempt compounds*)	Weight % water and exempt compounds*	Weight % VOC	Volume % water and exempt compounds*	Volume % Solids	Maximum Material Usage (gal/unit)	Maximum Capacity (units/hour)	Maximum Material Usage (gal/day)	Pounds VOC per gallon of coating less water and exempt compounds	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)	Pounds VOC per gallon of coating solids	Transfer Efficiency
Pure Asphalt #545	10.00	27.00%	7.00%	20.00%	2.00%	65.00%	7.50	12.00	2160.00	2.04	2.00	180.00	4320.00	788.40	719.42	3.08	75%
Pure Asphalt #7800	8.57	44.08%	44.08%	0.00%	23.27%	45.20%	7.50	12.00	2160.00	0.00	0.00	0.00	0.00	0.00	472.02	0.00	75%
Pure Asphalt #8655	8.80	70.00%	64.30%	5.70%	64.55%	25.81%	7.50	12.00	2160.00	1.41	0.50	45.14	1083.46	197.73	260.17	1.94	75%
Totals									2160.00			180.00	4320.00	788.40	719.42		

Control Efficiency =		95.0%
Total Controlled Potential to Emit (PTE) (tons/year) =		35.97

Methodology

*Exempt compounds include all compounds specifically exempted from the definition of volatile organic compounds (VOC) under 40 CFR 51.100(s).

Weight % VOC = [Weight % Volatile (water, VOC, and exempt Compounds*)] - [Weight % water and exempt Compounds]

Maximum Material Usage (gal/day) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Pounds of VOC per gallon coating less water and exempt Compounds = [Density (lbs/gal)] * [Weight % VOC] / [1 - (Volume % water and exempt Compounds)]

Pounds of VOC per gallon coating = [Density (lbs/gal)] * [Weight % VOC]

PTE of VOC (lbs/hour) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [Pounds of VOC per gallon coating]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hour)] * [24 hours/day]

PTE of VOC (tons/year) = [PTE of VOC (lbs/hour)] * [8760 hours/year] * [1 ton/2000 lbs]

Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) = [Density (lbs/gal)] * [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [1 - Weight % Volatile]] * [1 - Transfer Efficiency]] * [8760 hour/year] * [1 ton/2000 lbs]

Pounds VOC per gallon of coating solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % Solids]

Controlled PTE of PM/PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)] * [1 - Control Efficiency]

**All coatings are HAP free.

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

**Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Road 9, Howe, IN 46746
Operating Permit No.: F087-37915-00084
Revision No.: 087-47811-00084
Reviewer: Tori Tamburrino**

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)	80	2		0.0052	3.18E-04	1.00E-06	1.00E-06	0.832	0.051	1.60E-04	1.60E-04	0.051
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	
Oxyacetylene	1	2	15	0.1622	0.0005	0.0001	0.0003	0.292	0.001	0.000	0.001	0.002
Plasma**	8	0.375	150	0.0039				0.105	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								1.23				0.053
Potential Emissions lbs/day								29.50				1.27
Potential Emissions tons/year								5.38				0.23

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 emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/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: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Lippert Components, Inc., Plant 46
 Source Address: 3625 N. State Road 9, Howe, IN 46746
 Operating Permit No.: F087-37915-00084
 Revision No.: 087-47811-00084
 Reviewer: Tori Tamburrino

Heat Input Capacity MMBtu/hr	Unit Description	HHV mmBtu	Potential Throughput MMCF/yr
1.44	18 Radiant Space Heaters (H1 to H18) @ 0.08 MMBtu/hr each		
0.15	Radiant Space Heater (H19) @ 0.15 MMBtu/hr		
2.20	AMU (H20) @ 2.20 MMBtu/hr		
5.6	AMU (paint booth) @ 5.6 MMBtu/hr		
0.05	Water Heater (H21) @ 0.05 MMBtu/hr		
1.20	Rosebuds 8@0.15 mmBtu/Hr	1020	91.4
10.64	Total		

Emission Factor in lb/MMCF	Pollutant						
	PM ¹⁰	PM ^{2.5}	direct PM ^{2.5}	SO ₂	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.09	0.35	0.35	0.03	4.57	0.25	3.84

*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

See page 5 for HAPs emissions calculations.

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

Company Name: Lippert Components, Inc., Plant 46
 Source Address: 3625 N. State Road 9, Howe, IN 46746
 Operating Permit No.: F087-37915-00084
 Revision No.: 087-47811-00084
 Reviewer: Tori Tamburrino

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.9E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.6E-05	5.5E-05	3.4E-03	8.2E-02	1.6E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.3E-05	5.0E-05	6.4E-05	1.7E-05	9.6E-05

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 6 for Greenhouse Gas calculations.

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

Company Name: Lippert Components, Inc., Plant 46
 Source Address: 3625 N. State Road 9, Howe, IN 46746
 Operating Permit No.: F087-37915-00084
 Revision No.: 087-47811-00084
 Reviewer: Tori Tamburrino

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
	120,000	2.3	2.2
Potential Emission in tons/yr	5,483	0.11	0.10
Summed Potential Emissions in tons/yr	5,483		
CO ₂ e Total in tons/yr	5,516		

Methodology

The N₂O Emission Factor for uncontrolled is 2.2. The N₂O Emission Factor for low NOx burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO₂e (tons/yr) = CO₂ Potential Emission ton/yr x CO₂ GWP (1) + CH₄ Potential Emission ton/yr x CH₄ GWP (21) + N₂O Potential Emission ton/yr x N₂O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

Tim Stickler
Lippert Components Inc Plant 46
3501 CR 6
Elkhart, IN 46514

Re: Public Notice
Lippert Components, Inc., Plant 46
Permit Level: FESOP Significant Permit Revision
(Minor PSD/EO)
Permit Number: 087-47811-00084

Dear Tim Stickler:

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 47811

and

IDEM's Virtual File Cabinet (VFC): <https://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/public-notices/>

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 LaGrange County Public Library – Main Branch, 203 W. Spring Street in LaGrange, IN 46761. 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 Tori Tamburrino, 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 0043 or dial (317) 233-0043.

Sincerely,

Lisa Gaines

Lisa Gaines
Permits Branch
Office of Air Quality

Enclosures

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



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Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

To: LaGrange County Public Library – Main Branch

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 46
Permit Number: 087-47811-00084

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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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

Notice of Public Comment

June 27, 2024
Lippert Components, Inc., Plant 46
087-47811-00084

To: Interested Parties:

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity. The Indiana Department of Environmental Management, Office of Air Quality, invites your comments on the draft air permit.

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


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 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 Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

IDEM Staff	LGAINES 6/27/2024 Lippert Components Inc Plant 46 087-47811-00084 (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		Tim Stickler Lippert Components Inc Plant 46 3501 CR 6 Elkhart IN 46514 (Source CAATS)										
2		Jeff Holsinger Plant Manager Lippert Components Inc Plant 46 3625 N SR 9 Howe IN 46746 (RO CAATS)										
3		LaGrange County Public Library 203 W Spring St Lagrange IN 46761-1899 (Library)										
4		Topeka Town Council PO Box 127 Topeka IN 46571 (Local Official)										
5		LaGrange County Health Department 304 N Townline Rd, Ste 1 Lagrange IN 46761 (Health Department)										
6		LaGrange County Commissioners 114 W Michigan St LaGrange IN 46761 (Local Official)										
7		Dustin & Muranda Hall 401 N Townline Rd LaGrange IN 46761 (Affected Party)										
8		Lima Township Trustees Office PO Box 296 Howe IN 46746-0296 (Local Official)										
9		Mr. Roger Schneider The Goshen News 114 S Main St Goshen IN 46526 (Affected Party)										
10		Resident 6475 W 300 S Topeka IN 46571 (Affected Party)										
11												
12												
13												
14												
15												

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