

From: [Tamburrino, Victoria](#)
To: tstickler@lci1.com
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Thursday, May 9, 2024 12:43:00 PM
Attachments: [image001.png](#)

Dear Mr. Stickler,

I am the permit writer assigned to the current application No. 087-47811-00084 for Lippert Components Inc. Plant 46. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Lippert Components Inc. Plant 46 would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Madhurima Moulik) may be contacted at 317-233-0043 or mmoulik@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her
Environmental Manager, Office of Air Quality, Permits Branch
[IN Department of Environmental Management](#)
Phone: (317) 233-0043
Fax: 317-232-6749
Email: vtamburr@idem.in.gov

Help us improve!
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From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Friday, May 10, 2024 7:02:31 AM
Attachments: [image001.png](#)
[#8655 Paint TDS.doc](#)
[545 HF SDS.pdf](#)
[545HF TDS.doc](#)
[7800 Frame Coating TDS.doc](#)
[Air Permit App Checklist-Plt 46 Modification.doc](#)
[GSD-01 General Source Data Plant 46.doc](#)
[LCI - 2023 Air Permit AA Cover Sheet Plant 46.docx](#)
[Plant 46 Worksheet with Calcs for Emissions-DRAFT.xlsx](#)
[Pure Asphalt #7800 waterbased black coating SDS.PDF](#)
[Pure Asphalt #8655 waterbased black coating SDS.pdf](#)

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Tori,

Attached are the documents and calculations that you requested. Please let me know if you have any questions or need anything else.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Help us improve!
IDEM values your feedback



Whenever, wherever, we make your experience better.



PURE ASPHALT

MANUFACTURER OF SPECIALTY COATINGS SINCE 1927

PRODUCT DATA

3455 W. 31ST PLACE
CHICAGO, IL 60623
PHONE: 773.247.7030
FAX: 773.247.7066
WWW.PUREASPHALT.COM

#8655 Chassis Paint

DESCRIPTION

#8655 Paint is a gloss black water base acrylic modified alkyd, HAPS free, low VOC corrosion preventive coating with a very high 90 gloss. #8655 provides excellent protection for ferrous and non-ferrous metals with a single application. #8655 is an industrial coating suitable for direct to metal application to RV chassis, farm and construction equipment. Special order colors available.

PRODUCT DATA

Flash, Penske Martin Closed Cup, Minimum
Density, Weight/Gallon @ 77°F (25°C)
Specific Gravity @ 60°F (15.6°C)
Solids % by Weight
Volatile Organic Content (VOC)
Approximate Dry-to-Light Touch Time @ 77°F (25°C)
Corrosion Resistance (ASTM B-117)
Corrosion Resistance (SAE J2334) with Magnesium Chloride
Corrosion Resistance (NACE TM-01-69)

PROPERTIES

ABOVE 200°F
8.6 +/- .2 lbs. Per Gallon
1.01
30% +/- 0.2
<0.5 lbs/gallon
25-35 minutes
1000 hours minimum
1000 hours minimum
72 cycles - pass

SURFACE PREPARATION

Surfaces to be protected must be clean and dry and metal should be free of excessive water, rust, oil and mill scale.

APPLICATION

Ensure uniform consistency prior to use each day. Continued stirring is not required. The ambient and product temperature should be 50-95°F (10-35°C) at time of application. Refer to the MSDS (Material Safety Data Sheet) for additional handling instructions, Personal Protection Equipment requirements and first aid information before using.

APPLICATION EQUIPMENT

15-1 to 30:1 Reciprocating pumps with 40-50 lbs of air (Industrial Apps) .011 - .015 inches tip size
-Air Atomized – Industrial Spray Gun with air cap / air assist atomization
-Flow Coat & Dip Application - (thinning may be required; contact Pure)

DRY TIME

Will air dry to light touch in 20-30 min. and fully cure in 24 hrs @ 70F/22C. Dry time of this water based coating will be affected by application thickness, ambient temperature, air flow and relative humidity. Product is formulated to achieve early water and freeze resistance.

STORAGE

Store #8655 at temperatures between 50-95°F (10-35°C). DO NOT FREEZE. Protect from freezing during shipment and storage to avoid product damage.

CAUTION

Refer to the #8655 MSDS (Material Safety Data Sheet) for additional handling instructions, Personal Protection Equipment requirements and first aid information before using.

PACKAGING

Available in 5-gallon pails, 16 gal. kegs, 55 gal. drums and 330 gal. totes.

The information presented herein is based on the data available and is believed to be correct. However, nothing stated in this bulletin is to be taken as a warranty, expressed or implied regarding the accuracy of the information of the use of our product used singly or in conjunction with other products.

PURE ASPHALT CO. SAFETY DATA SHEET (SDS)

SECTION 1: IDENTIFICATION

| | |
|-----------------------|---|
| Product Name | #545 HF Undercoating |
| Other Names | UNDERCOATING |
| Use | Solvent based undercoating and sound deadener |
| Company | Pure Asphalt Co. 3455 W. 31st Place Chicago, IL Tel: (773) 247-7030 Fax: (773) 247-7066 |
| Emergency Tel. | ChemTrec 800-262-8200 |

SECTION 2: HAZARD(S) IDENTIFICATION

GHS HAZARD CLASSIFICATION:

| | | |
|-------------------------|--|------------|
| Physical Hazards | Flammable Liquid | Category 3 |
| Health Hazards | Skin irritation | Category 2 |
| | Eye irritation | Category 2 |
| | Target organ toxicity, repeat exposure | Category 2 |

LABEL ELEMENTS:



Signal Word

Warning

Hazard Statements

H226: Flammable liquid and vapour
H315: Causes skin irritation
H320: Causes eye irritation
H373: May cause damage to organs through prolonged or repeated exposure

Precautionary statements

Prevention

P210: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources.
No smoking.
P233: Keep container tightly closed.
P240: Ground and bond container and receiving equipment.
P241: Use explosion-proof electrical and lighting equipment.
P242: Use only non-sparking tools.
P243: Take precautionary measures against static discharge.
P280: Wear protective gloves, protective clothing, eye protection, and face protection.
P260: Do not breathe mist or spray.
P270: Do not eat, drink or smoke when using this product.
P264: Wash exposed areas thoroughly after handling.

| | |
|-----------------|--|
| Response | <p>P370+378: IN CASE OF FIRE: Use carbon dioxide (CO2), alcohol foam, water fog or dry chemical to extinguish. DO NOT use stream/jet of water as this will spread fire.</p> <p>P303+361+ IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with 353: water or shower.</p> <p>P302+352: IF ON SKIN: Wash with plenty of soap and water.</p> <p>P321: Specific treatment: Apply hand or body lotion to reduce irritation.</p> <p>P332+313: If skin irritation occurs: Get medical advice or attention.</p> <p>P362+364: Take off contaminated clothing and wash it before reuse.</p> <p>P305+351+ IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses 338: if present and easy to do – continue rinsing.</p> <p>P337+313: If eye irritation persists get medical advice and/or attention.</p> <p>P314: Get Medical advice/attention if you feel unwell.</p> <p>P331: Do NOT induce vomiting.</p> |
| Storage | <p>P403+235: Store in a well ventilated place. Keep cool.</p> |
| Disposal | <p>P501: Dispose of contents and container in accordance with local, regional, national, and international regulation.</p> |

Canadian WHMIS

Class B Division 3

Combustible liquid

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

Mixture

| Chemical Name | Common Name | CAS number | Percent by weight |
|-----------------------|--------------------|-------------------|--------------------------|
| Petroleum Distillates | Stoddard Solvent | 8052-41-3 | 40-50% |
| Petroleum Hydrocarbon | Asphalt | 8052-42-4 | 30-50% |

SECTION 4: FIRST-AID MEASURES

| | |
|-----------------------|---|
| General Advice | Take off immediately all contaminated clothing. Get Medical advice/attention if you feel unwell. Wash contaminated clothing before reuse. |
| Inhalation | Remove person to fresh air and keep comfortable for breathing. Get Medical attention if you feel unwell. |
| Skin | Take off immediately all contaminated clothing and wash it before reuse. Wash with plenty of soap and water. If skin irritation or a rash occurs: Get medical advice/attention. |
| Eye | Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do and continue rinsing. If eye irritation persists: Get medical attention. |
| Ingestion | IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Get Medical advice and/or attention if you feel unwell. |

Most important symptoms/effects, acute and delayed

Eye irritation. Symptoms may include stinging, tearing, redness, swelling and blurred vision.

Skin irritation: May cause redness, itching and/or pain.

Inhalation of mist/vapors: Prolonged or repeated exposure may cause chronic effects.

Indication of immediate medical attention and special treatment needed

Provide general supportive measures and treat symptomatically.

SECTION 5: FIRE-FIGHTING MEASURES**Suitable Extinguisher type(s)**

Use carbon dioxide (CO₂), alcohol foam, water fog or dry chemical to extinguish.

Unsuitable Extinguisher type

Do not use stream or jet of water as this will spread fire.

Specific hazardous arising from fire.

Vaporized material may form explosive mixture with air. Thermal decomposition (burning) will produce oxides of carbon including carbon monoxide and may also produce irritating, corrosive and/or toxic gases, vapors and fumes.

Special protective equipment for fire fighting.

Self-contained breathing apparatus and full protective gear must be worn in case of fire.

SECTION 6: ACCIDENTAL RELEASE MEASURES**Leak or spill procedures**

Remove all sources of ignition. Provide adequate ventilation.

Containment

Contain and absorb with inert material. (e.g. oil dry, sand)

Cleanup

Dispose in accordance with all local, state and federal regulations.

Precautions

In the event of a large spill, contain material and recover for use if possible. Avoid discharge into drains, water courses and the ground.

SECTION 7: HANDLING AND STORAGE**Storage**

Keep away from ignition sources. Keep containers tightly closed. Store in a cool, dry and well ventilated area.

Handling

Avoid prolonged or repeated skin contact and avoid breathing vapors.

Incompatible Contaminants

Avoid exposure to oxidizing agents.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**Ingredient****OSHA PEL****ACGIH TLV-TWA**

Petroleum Distillate

500 ppm

100 ppm

Engineering Controls

Use with adequate ventilation.

PPE

Eye/Face: Face shield, goggles

Skin: Chemical protective gloves.

Respiratory: Level of exposure needs to be determined. If required, use a particulate filter, a NIOSH-approved air purifying respirator with organic vapor cartridge or a supplied air respirator.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

Appearance

Form Liquid
Color Black

Flammability Limits

Upper ~6%
Lower ~0.8%

Odor Mild Petroleum Odor

Odor Threshold Not Determined

Vapor Pressure at 20°C <3 mm Hg, based on solvent

pH Not applicable

Vapor Density (air=1) >1

Evaporation Rate Not Determined

Specific Gravity, 16°C >1.0

Melting Point/Range Not Determined

Boiling Point/Range >350°F (>177°C)

Solubility Very slight

Partition Coefficient Not Determined

Flash Point 105°F Min

Flammability Class 3

Auto ignition Temperature > 410°F (>210°C)

Decomposition Temperature Not Determined

Viscosity Time, temperature and shear dependent

SECTION 10: STABILITY AND REACTIVITY

Reactivity

Chemical Stability Stable

Other

Hazardous Reactions Combustion

Polymerization Will not occur.

Conditions to Avoid Strong oxidizing agents: sources of ignition.

Incompatible Materials Strong oxidizing agents

Decomposition Hazards Combustion products: Oxides of carbon, nitrogen, and sulfur and potentially irritating and/or toxic fumes.

SECTION 11: TOXICOLOGICAL INFORMATION

| Ingredient | LD50 | LC50 |
|-----------------------|--------------------|-------------------------------------|
| Petroleum Distillates | Oral-Rat, > 5gm/Kg | 4 Hr.-Rat, > 5500 mg/M ³ |

Routes of Exposure

Inhalation May cause damage to organs through prolonged or repeated exposure

Ingestion Expect low ingestion hazard. Do NOT induce vomiting. AVOID ASPIRATION.

Skin Contact Causes skin irritation

Eye Contact Causes eye irritation

Delayed, Immediate, and Long**Term Exposure**

Prolonged or repeated inhalation of petroleum distillates may cause damage to organs.

Carcinogenicity

None of the components of this mixture are considered to be a carcinogen by IARC, ACGIH, NTP, OR OSHA.

Bitumen fumes generated at paving temperatures in excess of 250°F (120°C) are classified by IARC as "possibly carcinogenic to humans" (Group 2B) but this product is used at ambient temperatures and does not generate fumes.

SECTION 12: ECOLOGICAL INFORMATION

Eco toxicity

This mixture contains components that are potentially toxic to freshwater and saltwater ecosystems.

Environmental Fate

This material may be harmful to aquatic organisms and may cause long term adverse effects in the aquatic environment.

SECTION 13: DISPOSAL CONSIDERATIONS

Hazard characteristic and regulatory waste classification can change with product use. Accordingly, it is the responsibility of the user to determine the proper handling and disposition for disposal according to local, state, federal and international regulations.

SECTION 14: TRANSPORT INFORMATION

For Industrial/Professional Use Only-Keep out of reach of Children**Domestic (US and US to Canada)**

Proper shipping name: Combustible liquid, n.o.s. (contains Mineral Spirits)

Identification Numbers: NA1993

Class or Division: Comb liq

Packing Group: III

Label Codes: None

Special Provisions: IB3, T1, T4, TP1

Packaging

Exceptions: 173.150

Non-Bulk: 173.203

Bulk: 173.241

Quantity Limitations

Passenger Aircraft/Rail: 60 L

Cargo Aircraft Only: 220L

Vessel Stowage

Location: A

Other:

International (including within Canada)

Proper shipping name: Petroleum products, n.o.s.

Identification Numbers: UN1268

Class or Division: 3
Packing Group: III
Label Codes: 3
Special Provisions: 144, B1, IB3, T4, TP1, TP29

Packaging

Exceptions: 173.150
Non-Bulk: 173.203
Bulk: 173.242

Quantity Limitations

Passenger Aircraft/Rail: 60 L
Cargo Aircraft Only: 220L

Vessel Stowage

Location: A
Other:

Transport in Bulk according to Annex II of MARPOL 73/78 and the IBC Code

SECTION 15: REGULATORY INFORMATION

| | |
|---|---|
| TSCA | All components are on the TSCA inventory. |
| Sara Title III, Section 313 | No, None |
| Sara Title III, Section 311, 312 | Fire Hazard |

SECTION 16: OTHER INFORMATION

The information and recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind expressed or implied is made with respect to the information contained herein.

PURE ASPHALT

MANUFACTURER OF SPECIALTY COATINGS SINCE 1927

PRODUCT DATA

3455 W. 31ST PLACE
CHICAGO, IL 60623
PH: 773.247.7030
FAX: 773.247.7066
WWW.PUREASPHALT.COM

#545 Chassis Coating / Undercoating

DESCRIPTION

#545 is a HAPS free, high solids / low volatile (VOC's) solvent-based coating for corrosion protection of underside chassis components of automotive vehicles, cargo trailers, travel trailers, bus bodies, mobile home frames etc. Provides a tough yet flexible coating for superior protection against corrosion caused by moisture, salt and alkalis and abrasion. Shows excellent direct to metal adhesion to production grade steel. #545 has immediate water and weather resistance for quick movement of processed units.

COMPOSITION

An abrasive free material, formulated with refined petroleum hydrocarbons and corrosion inhibitors. #545 is blended using a quick dry mineral spirits solvent to achieve fast dry times without the use of flammable solvents. A 142 F flash point makes it safer to ship, store, use and more OSHA friendly than flammable solvents.

PROPERTIES

| | |
|--|------------------------|
| Color | Black |
| Weight per gallon | 9.8 lbs. +or- .2 |
| Flash Point | 142 degrees F Min. |
| Solids % | 70 +or- 2 |
| Viscosity | 3500-4500 cps |
| Vertical Sag | 25 mils wet (sheared) |
| Salt Spray @ 5% ASTM B-117 | 1500 hrs. min. |
| Corrosion Resistance NACE TM-001-69 | 72 cycles - pass |
| Federal Specification TT-C-520-B | pass |
| Federal Specification FMVSS 302 (burn) | pass |
| Gravelometer J400 | 7A |
| V.O.C. | 2.0 lbs per gallon |

APPLICATION

#545 sprays best at 70-80F. Although mixing is usually not required, ensure uniform consistency prior to use. Apply with conventional airless spray equipment. Refer to the MSDS (Material Safety Data Sheet) for additional handling instructions, Personal Protection Equipment requirements and first aid information before using.

Industrial 33-1 Graco Bulldog, King or NXT w/ 35-45 psi .017-.023 inches tip

DRY TIME

Will skin in 60-90 mins., dry to firm touch in 4 hrs, and fully cure in 24 hrs. Air movement will speed the drying process. Water and cold weather resistance is achieved immediately after spraying.

EQUIPMENT CARE AND CLEAN-UP

Dried material can be removed with mineral spirits. Take necessary precautions when handling combustible materials.

PACKAGING

Available in 5 gal pails; 16 gallon kegs or 55 gallon drums, 330 gallon totes.

PURE ASPHALT

MANUFACTURER OF SPECIALTY COATINGS SINCE 1927

PRODUCT DATA

3455 W. 31ST PLACE
CHICAGO, IL 60623
PHONE: 773.247.7030
FAX: 773.247.7066
WWW.PUREASPHALT.COM

7800 Frame Coating

DESCRIPTION

A semi-fluid waterborne coating for the protection of metal frames, chassis, and other underbody components of mobile homes, trailers, utility bodies, bus bodies, RV's and other vehicles. Provides a tough, pliable rubberized coating for protection against abrasion and corrosion. Resists salt, alkalis and seals out moisture. Affords sound deadening and vibration dampening to metal and fiberglass surfaces. This fast drying coating dries tack free, glossy, and black. This coating offers superior rust coverage and bleed through protection. Once this coating is cured, it will not wash off in the rain.

MATERIALS

7800 is composed of an abrasive free material, formulated with an asphalt emulsion, modified polymer additives and inert fillers.

APPLICATION

7800 can be cold applied with conventional airless spray equipment with a minimum amount of spray back and fogging. #7800 has been formulated for factory "direct to metal" applications to cover, adhere and protect when applied over pickled / oily surfaces and rusted metals.

APPLICATION EQUIPMENT

33:1 Reciprocating pumps with 40 - 50 lbs of air
(For Industrial applications w/ large pumps)

Tip sizes
.019 - .025 inches

DRY TIME

7800 will dry to light touch in 20-45 min., and fully cure in 24 hrs @ 70F. Product is formulated to achieve early water and freeze resistance that will be indicated by a change of color from brown (when first sprayed) to black.

PHYSICAL PROPERTIES

| | |
|---------------------------|--------------------------------------|
| Color | Black |
| HAPS Content | None – HAPS free |
| Flash Point | Not Applicable (water based) |
| V.O.C. Content | Zero |
| Fed Spec. TTC-520-B | Pass |
| Bend Resistance ASTM D522 | Passes 0.5 inch mandrel bend at 0 °F |

PACKAGING

Available in 55-gallon drums; 330 gallon totes, or tankers.

CARE AND CLEAN UP OF EQUIPMENT

Spray guns, brushes and tools used for application, should be immersed in soapy water or when not in use. Dried material can be removed with mineral spirits. Do not flush with Mineral spirits or other solvents.

PROTECT FROM FREEZING

This product will be permanently damaged if frozen. Please protect from severe weather. Store in a warm place.



OAQ AIR PERMIT APPLICATION – FORMS CHECKLIST

State Form 51607 (R5 / 1-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
 100 N. Senate Avenue, MC 61-53 Room 1003
 Indianapolis, IN 46204-2251
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-451-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
www.IN.gov/idem

- NOTES:**
- The purpose of this checklist is to help the applicant and IDEM, OAQ ensure that the air permit application packet is administratively complete. This checklist is a required form.
 - Check the appropriate box indicating whether each application form is applicable for the current permit application. The source must submit only those forms pertinent to the current permit application.
 - Place this checklist between the cover sheet and all subsequent forms and attachments that encompass your air permit application packet.

| Part A: General Source Data | | | | |
|--|-----------|--------------------------------------|-------------------|--|
| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | COVER | Application Cover Sheet | 50639 | Include for every application, modification, and renewal, including source specific operating agreements (SSOA). |
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | CHECKLIST | Forms Checklist | 51607 | Include for every application, modification, and renewal, including SSOA. |
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | GSD-01 | Basic Source Level Information | 50640 | Include for every application, modification, and renewal, including SSOA. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-02 | Plant Layout Diagram | 51605 | Include for every new source application, and modification. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-03 | Process Flow Diagram | 51599 | Include one for every process covered by the application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-04 | Stack / Vent Information | 51606 | Include for every new source application, and modification. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-05 | Emissions Unit Information | 51610 | Include for every process covered by the application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-06 | Particulate Emissions Summary | 51612 | Include if the process has particulate emissions (PM). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-07 | Criteria Pollutant Emissions Summary | 51602 | Include if the process has criteria pollutant emissions. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-08 | HAP Emissions Summary | 51604 | Include if the process has hazardous air pollutant emissions (HAP). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-09 | Summary of Additional Information | 51611 | Include if the additional information is included. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-10 | Insignificant Activities | 51596 | Include if there are unpermitted insignificant activities. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-11 | Alternative Operating Scenario | 51601 | Include if an AOS is requested. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-12 | Affidavit of Nonapplicability | 51600 | Include if the standard notification requirements do not apply. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-13 | Affidavit of Applicability | 51603 | Include if the standard notification requirements apply. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-14 | Owners and Occupants Notified | 51609 | Include if the standard notification requirements apply. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | GSD-15 | Government Officials Notified | 51608 | Include if the standard notification requirements apply. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | RENEWAL | Renewal Checklist | 51755 | Include with every operating permit renewal packet. |

Part B: Process Information

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|----------|---|-------------------|--|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | AEF-01 | Alternate Emission Factor Request | 51860 | Submit if you are requesting to use an emission factor other than AP-42. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-01 | Miscellaneous Processes | 52534 | Include one form for each process for which there is not a specific PI form. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02A | Combustion Unit Summary | 52535 | Include one form to summarize all combustion units (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02B | <i>Combustion:</i> Boilers, Process Heaters, & Furnaces | 52536 | Include one form for each boiler, process heater, or furnace (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02C | <i>Combustion:</i> Turbines & Internal Combustion Engines | 52537 | Include one form for each turbine or internal combustion engine (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02D | <i>Combustion:</i> Incinerators & Combustors | 52538 | Include one form for each incinerator or combustor (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02E | <i>Combustion:</i> Kilns | 52539 | Include one form for each kiln (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02F | <i>Combustion:</i> Fuel Use | 52540 | Include one form for each combustion unit (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02G | <i>Combustion:</i> Emission Factors | 52541 | Include one form for each combustion unit (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-02H | <i>Combustion:</i> Federal Rule Applicability | 52542 | Include one form for each combustion unit (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-03 | Storage and Handling of Bulk Material | 52543 | Include if the process involves the storage and handling of bulk materials. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-04 | Asphalt Plants | 52544 | Include for each asphalt plant process (<i>unless general permit</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-05 | Brick / Clay Products | 52545 | Include for each brick and/or clay products process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-06 | Electroplating Operations | 52546 | Include for each electroplating process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-07 | Welding Operations | 52547 | Include for each welding process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-08 | Concrete Batchers | 52548 | Include for each concrete batcher (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-09 | Degreasing | 52549 | Include for each degreasing process (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-10 | Dry Cleaners | 52550 | Include for each dry cleaning process |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-11 | Foundry Operations | 52551 | Include for each foundry process |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-12 | Grain Elevators | 52552 | Include for each grain elevator (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-13 | Lime Manufacturing | 52553 | Include for each lime manufacturing process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-14 | Liquid Organic Compound Storage | 52554 (doc) | Include if the process involves the storage of liquid organic compounds. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-14ALT | Alternate version of Liquid Organic Compound Storage | 52555 (xls) | Include if the process involves the storage of liquid organic compounds and there are several storage vessels. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-15 | Portland Cement Manufacturing | 52556 | Include for each Portland cement manufacturing process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-16 | Reinforced Plastics & Composites | 52557 | Include for each reinforced plastics and composites process. |

Continued on Next Page

| Part B: Process Information | | | | |
|--|----------------|---|--------------------------|---|
| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-17 | Blasting Operations | 52558 | Include for each blasting process (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-18 | Mineral Processing | 52559 | Include if the process involves mineral processing (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-19 | Surface Coating & Printing Operations | 52560 | Include for each surface coating or printing process (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-20 | Woodworking / Plastic Machining | 52561 | Include for each woodworking or plastic machining process (<i>unless SSOA</i>). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-21 | Site Remediation | 52570 | Include for each soil remediation process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PI-22 | Ethanol Plants (<i>Under Development</i>) | None | Include for each ethanol plant. |

| Part C: Control Equipment | | | | |
|--|----------------|--|--------------------------|---|
| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-01 | Control Equipment Summary | 51904 | Include if add-on control equipment will be used for the process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-02 | Particulates – Baghouse / Fabric Filter | 51953 | Include for each baghouse or fabric filter. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-03 | Particulates – Cyclone | 52620 | Include for each cyclone. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-04 | Particulates – Electrostatic Precipitator | 52621 | Include for each electrostatic precipitator. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-05 | Particulates – Wet Collector / Scrubber / Absorber | 52622 | Include for each wet collector, scrubber, or absorber. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-06 | Organics – Flare / Oxidizer / Incinerator | 52623 | Include for each flare, oxidizer, or incinerator. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-07 | Organics – Adsorbers | 52624 | Include for each adsorber. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-08 | Organics – Condenser | 52625 | Include for each condenser. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-09 | Reduction Technology | 52626 | Include for each control device using reduction technology (e.g., SCR, SNCR). |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CE-10 | Miscellaneous Control Equipment | 52436 | Include one form for equipment for which there is not a specific CE form. |

Part D: Compliance Determination for Part 70 Sources

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|---------|---|-------------------|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CD-01 | Emissions Unit Compliance Status | 51861 | Include for every Title V application, including modifications. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CD-02 | Compliance Plan by Applicable Requirement | 51862 | Include for every Title V application, including modifications. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CD-03 | Compliance Plan by Emissions Unit | 51863 | Include for every Title V application, including modifications. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | CD-04 | Compliance Schedule and Certification | 51864 | Include for every Title V application, including modifications and renewal. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | FED-03 | Compliance Assurance Monitoring | 53377 | Include for every Title V application, including modifications. |

Part E: Best Available Control Technology

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|-------------|---|-------------------|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | BACT-01 | Analysis of Best Available Control Technology | None | Include for every BACT application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | BACT-01a | Background Search: Existing BACT Determinations | None | Include for every BACT application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | BACT-01b | Cost/Economic Impact Analysis | None | Include for every BACT application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | BACT-02 | Summary of Best Available Control Technology | None | Include for every BACT application. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PSD / EO-01 | PSD / Emission Offset Checklist | None | Include for every PSD application and every NSR application that requires emission offsets. |

Part F: Emission Credit Registry

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|---------|--------------------------------|-------------------|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | EC-01 | Generation of Emission Credits | 51783 | Include if the modification results in emission reductions. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | EC-02 | Transfer of Emission Credits | 51784 | Submit whenever registered emission credits are transferred. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | EC-03 | Use of Emission Credits | 51785 | Include if the modification requires the use of emission credits for offsets. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | EC-04 | Emission Credit Request | 51906 | Submit if you are looking for emission credits for offsets. |

Part G: Plantwide Applicability Limits

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|---------|--|-------------------|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PAL-01 | Actuals Plantwide Applicability Limit | 52451 | Include if the modification results in emission reductions. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PAL-02 | Revised Plantwide Applicability Limit | 52452 | Submit whenever registered emission credits are transferred. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PAL-03 | Plantwide Applicability Limit Renewal | 52453 | Include if the modification requires the use of emission credits for offsets. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | PAL-04 | Request for Termination of Plantwide Applicability Limit | 52454 | Submit if you are looking for emission credits for offsets. |

Part H: Air Toxics

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|------------|---|-------------------|--|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | FED-01 | Summary of Federal Requirements – NSPS & NESHAP | 53512 | Include for each 40 CFR Part 60 NSPS, 40 CFR Part 61 NESHAP, and 40 CFR Part 63 NESHAP applicable to the process. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | FED-02 | MACT Pre-Construction Review | 51905 | Include if constructing or modifying a process subject to a Part 63 NESHAP. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | No Form ID | MACT Initial Notification | None | This form is available on the U.S. EPA website. Completed notifications should be submitted to the IDEM Compliance Branch. |

Part I: Special Permits

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|----------|-------------------------------|-------------------|--|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | INTERIM | Interim Approval | None | Submit if you are applying for interim operating approval. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | ASPHALT | Asphalt General Permit | None | Submit if you are applying for or modifying an asphalt plant general permit. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | NOXBTP | NO _x Budget Permit | None | Submit if you are a power plant or if you have opted in to the NO _x budget trading program. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | ACIDRAIN | Phase 2 Acid Rain Permit | None | Submit if you are applying for, modifying, or renewing a Phase 2 Acid Rain permit. |

Part J: Source Specific Operating Agreements (SSOA)

| Applicable? | Form ID | Title of Form | State Form Number | When should this form be included in my application packet? |
|--|---------|---|-------------------|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-01 | Summary of Application and Existing Agreements | 53438 | Submit if you are applying for or modifying a Source Specific Operating Agreement. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-02 | Industrial / Commercial Surface Coating Operations -OR- Graphic Arts Operations (326 IAC 2-9-2.5) | 53439 | Submit if you are applying for or modifying a SSOA for industrial or commercial surface coating operations not subject to 326 IAC 8-2; or graphic arts operations not subject to 326 IAC 8-5-5. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-03 | Surface Coating or Graphic Arts Operations (326 IAC 2-9-3) | 53440 | Submit if you are applying for or modifying a SSOA for surface coating or graphic arts operations. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-04 | Woodworking Operations (326 IAC 2-9-4) | 53441 | Submit if you are applying for or modifying a SSOA for woodworking operations. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-05 | Abrasive Cleaning Operations (326 IAC 2-9-5) | 53442 | Submit if you are applying for or modifying a SSOA for abrasive cleaning operations. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-06 | Grain Elevators (326 IAC 2-9-6) | 53443 | Submit if you are applying for or modifying a SSOA for grain elevators. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-07 | Sand And Gravel Plants (326 IAC 2-9-7) | 53444 | Submit if you are applying for or modifying a SSOA for sand and gravel plants. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-08 | Crushed Stone Processing Plants (326 IAC 2-9-8) | 53445 | Submit if you are applying for or modifying a SSOA for crushed stone processing plants. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-09 | Ready-Mix Concrete Batch Plants (326 IAC 2-9-9) | 53446 | Submit if you are applying for or modifying a SSOA for ready-mix concrete batch plants. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-10 | Coal Mines And Coal Preparation Plants (326 IAC 2-9-10) | 53447 | Submit if you are applying for or modifying a SSOA for coal mines and coal preparation plants. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-11 | Automobile Refinishing Operations (326 IAC 2-9-11) | 53448 | Submit if you are applying for or modifying a SSOA for automobile refinishing operations. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-12 | Degreasing Operations (326 IAC 2-9-12) | 53449 | Submit if you are applying for or modifying a SSOA for degreasing operations. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-13 | External Combustion Sources (326 IAC 2-9-13) | 53450 | Submit if you are applying for or modifying a SSOA for external combustion sources. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | OA-14 | Internal Combustion Sources (326 IAC 2-9-14) | 53451 | Submit if you are applying for or modifying a SSOA for internal combustion sources. |



OAQ GENERAL SOURCE DATA APPLICATION
GSD-01: Basic Source Level Information
 State Form 50640 (R5 / 1-10)
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
 100 N. Senate Avenue, MC 61-53 Room 1003
 Indianapolis, IN 46204-2251
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-451-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
www.IN.gov/idem

- NOTES:**
- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.
 - Detailed instructions for this form are available on the Air Permit Application Forms website.
 - All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

PART A: Source / Company Location Information

| | | | |
|---|--------------------|-------------------------------------|--|
| 1. Source / Company Name: Lippert Components Inc. Plant 46 | | 2. Plant ID: – | |
| 3. Location Address: 3625 N. State Road 9 | | | |
| City: Howe | State: IN | ZIP Code: 46746 – | |
| 4. County Name: LaGrange | | 5. Township Name: Bloomfield | |
| 6. Geographic Coordinates: | | | |
| Latitude: 41.692900 | | Longitude: -85.425120 | |
| 7. Universal Transferal Mercadum Coordinates (if known): | | | |
| Zone: | Horizontal: | Vertical: | |
| 8. Adjacent States: Is the source located within 50 miles of an adjacent state? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – <i>Indicate Adjacent State(s):</i> <input type="checkbox"/> Illinois (IL) <input checked="" type="checkbox"/> Michigan (MI) <input type="checkbox"/> Ohio (OH) <input type="checkbox"/> Kentucky (KY) | | | |
| 9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – <i>Indicate Nonattainment Pollutant(s):</i> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NO _x <input type="checkbox"/> O ₃ <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> SO ₂ | | | |
| 10. Portable / Stationary: Is this a portable or stationary source? <input type="checkbox"/> Portable <input checked="" type="checkbox"/> Stationary | | | |

PART B: Source Summary

| | |
|---|--|
| 11. Company Internet Address (optional): | |
| 12. Company Name History: Has this source operated under any other name(s)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – <i>Provide information regarding past company names in Part I, Company Name History.</i> | |
| 13. Portable Source Location History: Will the location of the portable source be changing in the near future? <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> No <input type="checkbox"/> Yes – <i>Complete Part J, Portable Source Location History, and Part K, Request to Change Location of Portable Source.</i> | |
| 14. Existing Approvals: Have any exemptions, registrations, or permits been issued to this source? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – <i>List these permits and their corresponding emissions units in Part M, Existing Approvals.</i> | |
| 15. Unpermitted Emissions Units: Does this source have any unpermitted emissions units? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – <i>List all unpermitted emissions units in Part N, Unpermitted Emissions Units.</i> | |
| 16. New Source Review: Is this source proposing to construct or modify any emissions units? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – <i>List all proposed new construction in Part O, New or Modified Emissions Units.</i> | |
| 17. Risk Management Plan: Has this source submitted a Risk Management Plan? <input checked="" type="checkbox"/> Not Required <input type="checkbox"/> No <input type="checkbox"/> Yes → Date submitted: _____ EPA Facility Identifier: – – | |

PART C: Source Contact Information

IDEM will send the original, signed permit decision to the person identified in this section. This person MUST be an employee of the permitted source.

18. Name of Source Contact Person: Tim Stickler

19. Title (optional): Corporate Environmental Manager

20. Mailing Address: 3501 County Road 6

City: Elkhart

State: IN

ZIP Code: 46514 –

21. Electronic Mail Address (optional): tstickler@lci1.com

22. Telephone Number: (260) 579 – 1190

23. Facsimile Number (optional): () –

PART D: Authorized Individual/Responsible Official Information

IDEM will send a copy of the permit decision to the person indicated in this section, if the Authorized Individual or Responsible Official is different from the Source Contact specified in Part C.

24. Name of Authorized Individual or Responsible Official: Jeff Holsinger

25. Title: Plant Manager

26. Mailing Address: 3625 North State Road 9

City: Howe

State: IN

ZIP Code: 46746 –

27. Telephone Number: (574) 312 – 5207

28. Facsimile Number (optional): () –

29. Request to Change the Authorized Individual or Responsible Official: Is the source officially requesting to change the person designated as the Authorized Individual or Responsible Official in the official documents issued by IDEM, OAQ? *The permit may list the title of the Authorized Individual or Responsible Official in lieu of a specific name.*

No Yes – **Change Responsible Official to:**

PART E: Owner Information

30. Company Name of Owner: Lippert Components, Inc.

31. Name of Owner Contact Person: Dionne Quiachon

32. Mailing Address: 3501 County Road 6

City: Elkhart

State: IN

ZIP Code: 46514 –

33. Telephone Number: (713) 818 – 2379

34. Facsimile Number (optional): () –

34. Operator: Does the "Owner" company also operate the source to which this application applies?

No – *Proceed to Part F below.* Yes – *Enter "SAME AS OWNER" on line 35 and proceed to Part G below.*

PART F: Operator Information

35. Company Name of Operator: Same as Owner

36. Name of Operator Contact Person:

37. Mailing Address:

City:

State:

ZIP Code: –

38. Telephone Number: () –

39. Facsimile Number (optional): () –

PART G: Agent Information

40. Company Name of Agent: N/A

41. Type of Agent: Environmental Consultant Attorney Other (specify):

42. Name of Agent Contact Person:

43. Mailing Address:

| | | |
|-------|--------|-------------|
| City: | State: | ZIP Code: - |
|-------|--------|-------------|

44. Electronic Mail Address (optional):

| | |
|-----------------------------|--|
| 45. Telephone Number: () - | 46. Facsimile Number (optional): () - |
|-----------------------------|--|

47. Request for Follow-up: Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination? No Yes

PART H: Local Library Information

48. Date application packet was filed with the local library:

49. Name of Library: LaGrange County Public Library

50. Name of Librarian (optional):

51. Mailing Address: 203 W. Spring Street

| | | |
|----------------|-----------|-------------------|
| City: LaGrange | State: IN | ZIP Code: 46761 - |
|----------------|-----------|-------------------|

52. Internet Address (optional):

53. Electronic Mail Address (optional):

| | |
|--|--|
| 54. Telephone Number: (260) 463 - 2841 | 55. Facsimile Number (optional): () - |
|--|--|

PART I: Company Name History (if applicable)

Complete this section only if the source has previously operated under a legal name that is different from the name listed above in Section A.

| 56. Legal Name of Company | 57. Dates of Use |
|---------------------------|------------------|
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |
| | to |

58. Company Name Change Request: Is the source officially requesting to change the legal name that will be printed on all official documents issued by IDEM, OAQ?

No Yes - Change Company Name to:

PART J: Portable Source Location History (if applicable)

Complete this section only if the source is portable and the location has changed since the previous permit was issued. The current location of the source should be listed in Section A.

| 59. Plant ID | 60. Location of the Portable Source | 61. Dates at this Location |
|--------------|-------------------------------------|----------------------------|
| - | N/A | to |
| - | | to |
| - | | to |
| - | | to |
| - | | to |
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| - | | to |
| - | | to |
| - | | to |

PART K: Request to Change Location of Portable Source (if applicable)

Complete this section to request a change of location for a portable source.

62. Current Location:

Address:

City:

State:

ZIP Code:

-

County Name:

63. New Location:

Address:

City:

State:

ZIP Code:

-

County Name:

PART L: Source Process Description

Complete this section to summarize the main processes at the source.

| 64. Process Description | 65. Products | 66. SIC Code | 67. NAICS Code |
|----------------------------------|--------------------------|--------------|----------------|
| Fabricated Structural Metal Mfg. | Mobile Home & RV Chassis | | 332312 |
| | | | |
| | | | |
| | | | |

PART M: Existing Approvals (if applicable)

Complete this section to summarize the approvals issued to the source since issuance of the main operating permit.

| 68. Permit ID | 69. Emissions Unit IDs | 70. Expiration Date |
|---------------|------------------------|---------------------|
| 087-37915-84 | EU-1 | 9/20/2027 |
| 087-37915-84 | EU-2 | 9/20/2027 |
| 087-37915-84 | EU-3 | 9/20/2027 |
| | | |

PART N: Unpermitted Emissions Units (if applicable)

Complete this section only if the source has emission units that are not listed in any permit issued by IDEM, OAQ.

| 71. Emissions Unit ID | 72. Type of Emissions Unit | 73. Actual Dates | | |
|-----------------------|----------------------------|--------------------|------------------------|-----------------|
| | | Began Construction | Completed Construction | Began Operation |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

PART O: New or Modified Emissions Units (if applicable)

Complete this section only if the source is proposing to add new emission units or modify existing emission units.

| 74. Emissions Unit ID | 75. NEW | 76. MOD | 77. Type of Emissions Unit | 78. Estimated Dates | | |
|-----------------------|---------|---------|----------------------------|---------------------|-----------------------|-----------------|
| | | | | Begin Construction | Complete Construction | Begin Operation |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |



AIR PERMIT APPLICATION COVER SHEET
 State Form 50639 (R4 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
 100 N. Senate Avenue, MC 61-53 Room 1003
 Indianapolis, IN 46204-2251
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-451-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
www.IN.gov/idem

- NOTES:**
- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
 - Submit the completed air permit application packet, including all forms and attachments, to **IDEM Air Permits Administration** using the address in the upper right hand corner of this page.
 - IDEM will send a bill to collect the filing fee and any other applicable fees.
 - Detailed instructions for this form are available on the Air Permit Application Forms website.

FOR OFFICE USE ONLY

PERMIT NUMBER:

DATE APPLICATION WAS RECEIVED:

1. Tax ID Number: **38-3420528**

PART A: Purpose of Application

Part A identifies the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source / Company Name: Lippert Components, Inc. - Plant 46 **3. Plant ID:** 087 – 00084

4. Billing Address: 3625 N. State Road 9

City: Howe **State:** IN **ZIP Code:** 46746 –

5. Permit Level: Exemption Registration SSOA MSOP FESOP TVOP PBR

6. Application Summary: *Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.*

| | | |
|---|---|--|
| <input type="checkbox"/> Initial Permit | <input type="checkbox"/> Renewal of Operating Permit | <input type="checkbox"/> Asphalt General Permit |
| <input type="checkbox"/> Review Request | <input type="checkbox"/> Revocation of Operating Permit | <input type="checkbox"/> Alternate Emission Factor Request |
| <input type="checkbox"/> Interim Approval | <input type="checkbox"/> Relocation of Portable Source | <input type="checkbox"/> Acid Deposition (Phase II) |
| <input type="checkbox"/> Site Closure | <input type="checkbox"/> Emission Reduction Credit Registry | |

Transition (between permit levels) *From:* *To:*

Administrative Amendment: *Company Name Change* *Change of Responsible Official*
 Correction to Non-Technical Information *Notice Only Change*
 Other (specify):

Modification: *New Emission Unit or Control Device* *Modified Emission Unit or Control Device*
 New Applicable Permit Requirement *Change to Applicability of a Permit Requirement*
 Prevention of Significant Deterioration *Emission Offset* *MACT Preconstruction Review*
 Minor Source Modification *Significant Source Modification*
 Minor Permit Modification *Significant Permit Modification*
 Other (specify): Revise PTE calculations for EU-1

7. Is this an application for an initial construction and/or operating permit for a "Greenfield" Source? Yes No

8. Is this an application for construction of a new emissions unit at an Existing Source? Yes No

PART B: Pre-Application Meeting

Part B specifies whether a meeting was held or is being requested to discuss the permit application.

9. Was a meeting held between the company and IDEM prior to submitting this application to discuss the details of the project?

No Yes: *Date:*

10. Would you like to schedule a meeting with IDEM management and your permit writer to discuss the details of this project?

No Yes: *Proposed Date for Meeting:*

PART C: Confidential Business Information

Part C identifies permit applications that require special care to ensure that confidential business information is kept separate from the public file.

Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

11. Is any of the information contained within this application being claimed as **Confidential Business Information**?

No Yes

PART D: Certification Of Truth, Accuracy, and Completeness

Part D is the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

For a Part 70 Operating Permit (TVOP) or a Source Specific Operating Agreement (SSOA), a "responsible official" as defined in 326 IAC 2-7-1(34) must certify the air permit application. For all other applicants, this person is an "authorized Individual" as defined in 326 IAC 2-1.1-1(1).

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Jeff Holsinger _____
Name (typed)

Plant Manager _____
Title

Signature

Date

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| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 |
| <input type="checkbox"/> Adult Signature Required | \$0.00 |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 |

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**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Route 9, Howe, IN 46746
Permit Number: F087-37915-00084
PIt ID: 087-00084
Reviewer:

| | Unlimited/Uncontrolled Potential to Emit Tons per Year | | | | | | | | | | |
|--------------------------|---|----------------|----------------|-----------------|-------------|---------------|-------------|---------------------------|-------------|------------------|-----------|
| Process/Emission Unit | PM | PM10 | PM2.5 | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | Total HAPs | Worst Single HAP | HAP Name |
| Surface Coating (EU-01) | 2631.50 | 2631.50 | 2631.50 | 0.00 | 0.00 | 109.19 | 0.00 | 0 | 0.00 | 0.00 | |
| Welding/Cutting | 5.38 | 5.38 | 5.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.23 | 0.23 | Manganese |
| Natural Gas Combustion | 0.09 | 0.35 | 0.35 | 0.03 | 4.57 | 0.25 | 3.84 | 5,516 | 0.09 | 0.08 | Hexane |
| Insignificant Activities | negl. | negl. | negl. | negl. | negl. | negl. | negl. | negl. | negl. | negl. | |
| Total: | 2636.97 | 2637.23 | 2637.23 | 0.03 | 4.57 | 109.44 | 3.84 | 5,516 | 0.32 | 0.23 | Manganese |

| | Limited Potential to Emit Tons per Year | | | | | | | | | | |
|--------------------------|--|---------------|---------------|-----------------|-------------|--------------|-------------|---------------------------|-------------|------------------|-----------|
| Process/Emission Unit | PM | PM10 | PM2.5 | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | Total HAPs | Worst Single HAP | HAP Name |
| Surface Coating (EU-01)* | 131.58 | 131.58 | 131.58 | 0.00 | 0.00 | 98.90 | 0.00 | 0 | 0.00 | 0.00 | |
| Welding/Cutting | 5.38 | 5.38 | 5.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.23 | 0.23 | Manganese |
| Natural Gas Combustion | 0.09 | 0.35 | 0.35 | 0.03 | 4.57 | 0.25 | 3.84 | 5,516 | 0.09 | 0.08 | Hexane |
| Total: | 137.05 | 137.31 | 137.31 | 0.03 | 4.57 | 99.15 | 3.84 | 5,516 | 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: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Route 9, Howe, IN 46746
Permit Number: F087-37915-00084
Pit ID: 087-00084
Reviewer:**

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum Units(unit/hour) | Gal of Mat. (gal/hour) | Gal of Mat. (gal/day) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (PM/PM10/PM2.5) (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|-------------------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|--------------------------|------------------------|-----------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--|-------------------|---------------------|
| Pure Asphalt #545 | 9.8 | 2.60% | 0.3% | 2.3% | 0.4% | 72.00% | 7.50 | 12.0 | 90.00 | 2160.00 | 0.23 | 0.23 | 20.29 | 486.86 | 88.85 | 940.68 | 0.31 | 75% |
| Pure Asphalt #7800 waterbased | 8.6 | 0.00% | 30.0% | 0.0% | 30.9% | 0.52% | 7.50 | 12.0 | 90.00 | 2160.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 847.53 | 0.00 | 75% |
| Pure Asphalt #8655 waterbased black | 8.6 | 0.50% | 28.0% | 0.6% | 28.8% | 0.32% | 7.50 | 12.0 | 90.00 | 2160.00 | 0.07 | 0.05 | 4.64 | 111.46 | 20.34 | 843.29 | 16.13 | 75% |

| | | | | | | | |
|----------------|---------------|---------------|---------------------------|--------------|---------------|---------------|----------------|
| 1.50000 | 35.000 | 52.500 | Totals: | 24.93 | 598.32 | 109.19 | 2631.50 |
| 6.50000 | 12.000 | 78.000 | Filter Efficiency: | 95.00% | | | 131.58 |

Note: Coatings do not contain any HAPs.

METHODOLOGY

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

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

Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Route 9, Howe, IN 46746
Permit Number: F087-37915-00084
Pit ID: 087-00084
Reviewer:

| 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 Route 9, Howe, IN 46746
Permit Number: F087-32468-00084
Permit Number: F087-37915-00084
Plt ID: 087-00084
Reviewer:

| Heat Input Capacity MMBtu/hr | Unit Description |
|---------------------------------|---|
| 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 |
| 10.64 | Total |

| |
|-------------|
| HHV |
| mmBtu |
| mmscf |
| 1020 |

| |
|----------------------|
| Potential Throughput |
| MMCF/yr |
| 91.4 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|------|---------------------------|------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx 100 **see below | VOC | CO |
| 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 Route 9, Howe, IN 46746
Permit Number: F087-32468-00084
Plt ID: 087-00084
Reviewer:
Date:

| HAPs - Organics | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-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 |

| HAPs - Metals | | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | 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 Route 9, Howe, IN 46746
Permit Number: F087-32468-00084
Plt ID: 087-00084
Reviewer:
Date:

| | Greenhouse Gas | | |
|---------------------------------------|----------------|------|------|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 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 | | |
| CO2e 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).

PURE ASPHALT CO

SAFETY DATA SHEET (SDS)

SECTION 1: IDENTIFICATION

| | |
|-----------------------|---|
| Product Name | #7800 Chassis Coating |
| Other Names | Water Based Protective Chassis Coating, Underbody Coating |
| Use | Protective Chassis Coating |
| Company | Pure Asphalt Co. 3455 W. 31st Place Chicago, IL 60623 Tel: (773) 247-7030 Fax: (773) 247-7066 |
| Emergency Tel. | ChemTrec 800-262-8200 |

SECTION 2: HAZARD(S) IDENTIFICATION

GHS HAZARD CLASSIFICATION:

| | | |
|-----------------------------------|--|---|
| Physical Hazards | None | |
| Health Hazards | Acute Toxicity-Oral Acute Toxicity-Inhalation Skin Corrosion/Irritation Eye Damage/Irritation | Category 5 Category 5 Category 3 Category 2B |
| Aquatic Environment Hazard | Acute | Category 3 |

LABEL ELEMENTS:

| | |
|--|---|
| Signal Word | Warning |
| Hazard Statements | H303: May be harmful if swallowed H333: May be harmful if inhaled H316: Causes mild skin irritation H320: Causes eye irritation H402: Harmful to aquatic life |
| Precautionary statements Prevention | P264: Wash thoroughly after handling. P273: Avoid release to the environment.- <i>if this is not the intended use.</i> |

Response

P312: Call a POISON CENTER or doctor if you feel unwell.

P304+312: IF INHALED: Call a POISON CENTER or doctor/physician if you feel unwell.

P332+313: If skin irritation occurs: Get medical advice/attention.

P305+351+ IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do – continue rinsing.

P337+313: If eye irritation persists get medical advice/attention.

Storage

Keep from freezing.

Disposal

P501: Dispose of contents and container in accordance with local, regional, national, and international regulation.

Canadian WHMIS

NA

SECTION 3: COMPOSITION/INFORMATION ON HAZARDOUS INGREDIENTS

Mixture

| Chemical Name | Common Name | CAS number | Percent by weight |
|----------------------|--------------------|-------------------|--------------------------|
| Petroleum Asphalt | Asphalt | 8052-42-4 | 30-70% |

SECTION 4: FIRST-AID MEASURES

| | |
|---|---|
| General Advice | Take off immediately all contaminated clothing. Get Medical advice/attention if you feel unwell. Wash contaminated clothing before reuse. |
| Inhalation | Remove person to fresh air and keep comfortable for breathing. Get Medical attention if you feel unwell. |
| Skin | Take off immediately all contaminated clothing and wash it before reuse. Wash with plenty of soap and water. If skin irritation or a rash occurs: Get medical advice/attention. |
| Eye | Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do and continue rinsing. If eye irritation persists: Get medical attention. |
| Ingestion | IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Get Medical advice and/or attention if you feel unwell. |
| Most important symptoms/effects, acute and delayed | Eye irritation. Symptoms may include stinging, tearing, redness, swelling and blurred vision. Skin irritation: May cause redness, itching and/or pain. Inhalation of mist/vapors: Prolonged or repeated exposure may cause chronic effects. |
| Indication of immediate medical attention and special treatment needed | Provide general supportive measures and treat symptomatically. |

SECTION 5: FIRE-FIGHTING MEASURES

This material is water based and is not combustible under normal conditions. If the material is exposed to sufficient heat for sufficient time to evaporate the water, combustion may occur.

| | |
|--|--|
| Suitable Extinguisher type(s) | Use carbon dioxide (CO ₂), alcohol foam, water fog or dry chemical to extinguish. |
| Unsuitable Extinguisher type | Do not use stream or jet of water as this will spread fire. |
| Specific hazardous arising from fire. | Vaporized material may form explosive mixture with air. Thermal decomposition (burning) will produce oxides of carbon including carbon monoxide and may also produce irritating, corrosive and/or toxic gases, vapors and fumes. |
| Special protective equipment for fire fighting. | Self-contained breathing apparatus and full protective gear must be worn in case of fire. |

SECTION 6: ACCIDENTAL RELEASE MEASURES

| | |
|---------------------------------|---|
| Leak or spill procedures | Provide adequate ventilation. |
| Containment | Contain and absorb with inert material. (e.g. oil dry, sand) |
| Cleanup | Dispose in accordance with all local, state and federal regulations. |
| Precautions | In the event of a large spill, contain material and recover for use if possible. Avoid discharge into drains, water courses and the ground. |

SECTION 7: HANDLING AND STORAGE

| | |
|----------------------------------|--|
| Storage | Keep from freezing. Keep containers tightly closed. Store in a cool, dry and well ventilated area. |
| Handling | Avoid prolonged or repeated skin contact and avoid breathing vapors. |
| Incompatible Contaminants | Avoid exposure to oxidizing agents. |

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

| | |
|-----------------------------|---|
| Engineering Controls | Use with adequate ventilation. |
| PPE | Eye/Face: Face shield, goggles Skin: Chemical protective gloves. Respiratory: Level of exposure needs to be determined. If required, use a particulate filter, a NIOSH-approved air purifying respirator with organic vapor cartridge or a supplied air respirator. |

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

| | |
|-------------------------------|---------------------|
| Appearance | |
| Form | Liquid |
| Color | Dark brown to Black |
| Flammability Limits | |
| Upper | Not applicable |
| Lower | Not applicable |
| Odor | Mild Petroleum Odor |
| Odor Threshold | Not Determined |
| Vapor Pressure at 20°C | 2.3 kilopascal |
| pH | 8-10 |
| Vapor Density (air=1) | >1 |

| | |
|----------------------------------|----------------------------|
| Evaporation Rate | Not Determined |
| Specific Gravity, 16°C | 1.027 |
| Melting Point/Range | 32°F (0°C) |
| Boiling Point/Range | 212°F (100°C) |
| Solubility | Dispersible |
| Partition Coefficient | Not Determined |
| Flash Point | Not applicable |
| Flammability | Nonflammable |
| Auto ignition Temperature | Not applicable |
| Decomposition Temperature | Not Determined |
| Viscosity | >1000 mm ² /sec |

SECTION 10: STABILITY AND REACTIVITY

Reactivity

Chemical Stability

Stable

Other

Hazardous Reactions

None known

Polymerization

Will not occur.

Conditions to Avoid

Freezing and boiling

Incompatible Materials

None known

Decomposition Hazards

Combustion products: Oxides of carbon, nitrogen, and sulfur and potentially irritating and/or toxic fumes.

SECTION 11: TOXICOLOGICAL INFORMATION

Routes of Exposure

Inhalation

Excessive inhalation of mist may cause blockage of airways.

Ingestion

Expect low ingestion hazard. Do NOT induce vomiting.

Skin Contact

Causes mild skin irritation

Eye Contact

Causes eye irritation

Delayed, Immediate, and Long Term Exposure

None known

Carcinogenicity

None of the components of this mixture are considered to be a carcinogen by IARC, ACGIH, NTP, OR OSHA.

Bitumen fumes generated at paving temperatures in excess of 250°F (120°C) are classified by IARC as "possibly carcinogenic to humans" (Group 2B) but this product is used at ambient temperatures and does not generate fumes.

SECTION 12: ECOLOGICAL INFORMATION

Eco toxicity

This mixture contains components that are potentially toxic to freshwater and saltwater ecosystems.

Environmental Fate

This material may be harmful to aquatic organisms.

SECTION 13: DISPOSAL CONSIDERATIONS

Hazard characteristic and regulatory waste classification can change with product use. Accordingly, it is the responsibility of the user to determine the proper handling and disposition for disposal according to local, state, federal and international regulations.

SECTION 14: TRANSPORT INFORMATION

For Industrial/Professional Use Only-Keep out of reach of Children. Keep from freezing.

DOT No label required. Not regulated for transport.

Proper shipping name: n/a

Identification Numbers: n/a

Class or Division: n/a

Packing Group: n/a

Label Codes: n/a

Special Provisions: n/a

Packaging

Exceptions: n/a

Non-Bulk: n/a

Bulk: n/a

Quantity Limitations

Passenger Aircraft/Rail: n/a

Cargo Aircraft Only: n/a

Vessel Stowage

Location: n/a

Other: n/a

Transport in Bulk according to Annex II of MARPOL 73/78 and the IBC Code

SECTION 15: REGULATORY INFORMATION

TSCA All components are on the TSCA inventory.

Sara Title III, Section 313 No, None

Sara Title III, Section 311, 312 No, None

SECTION 16: OTHER INFORMATION

The information and recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind expressed or implied is made with respect to the information contained herein.

PURE ASPHALT CO

SAFETY DATA SHEET (SDS)

SECTION 1: IDENTIFICATION

Product Name #8655 Black Water Base Chassis Paint
Other Names Black Acrylic Enamel

Use Latex paint for Chassis

Company Pure Asphalt Co.
3455 W. 31st Place
Chicago, IL 60623
Tel: (773) 247-7030
Fax: (773) 247-7066

Emergency Tel. ChemTrec 800-262-8200

SECTION 2: HAZARD(S) IDENTIFICATION

GHS HAZARD CLASSIFICATION:

Physical Hazards None

Health Hazards Acute Toxicity-Oral Category 5
Acute Toxicity-Inhalation Category 5
Skin Corrosion/Irritation Category 3
Eye Damage/Irritation Category 2B

Aquatic Environment Hazard Acute Category 3

LABEL ELEMENTS:

Signal Word Warning

Hazard Statements H303: May be harmful if swallowed
H333: May be harmful if inhaled
H316: Causes mild skin irritation
H320: Causes eye irritation
H402: Harmful to aquatic life

Precautionary statements **Prevention**

P264: Wash thoroughly after handling.
P273: Avoid release to the environment.-if this is not the intended use.

Response

P312: Call a POISON CENTER or doctor if you feel unwell.
P304+312: IF INHALED: Call a POISON CENTER or doctor/physician if you feel unwell.

P332+313: If skin irritation occurs: Get medical advice/attention.
P305+351+ IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do – continue rinsing.
P337+313: If eye irritation persists get medical advice/attention.

Storage Keep from freezing.

Disposal P501: Dispose of contents and container in accordance with local, regional, national, and international regulation.

Canadian WHMIS NA

SECTION 3: COMPOSITION/INFORMATION ON HAZARDOUS INGREDIENTS

Mixture

| Chemical Name | Common Name | CAS number | Percent by weight |
|---------------|-------------|-------------|-------------------|
| Polymer blend | Latex | Proprietary | 20-60% |

SECTION 4: FIRST-AID MEASURES

| | |
|---|---|
| General Advice | Take off immediately all contaminated clothing. Get Medical advice/attention if you feel unwell. Wash contaminated clothing before reuse. |
| Inhalation | Remove person to fresh air and keep comfortable for breathing. Get Medical attention if you feel unwell. |
| Skin | Take off immediately all contaminated clothing and wash it before reuse. Wash with plenty of soap and water. If skin irritation or a rash occurs: Get medical advice/attention. |
| Eye | Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do and continue rinsing. If eye irritation persists: Get medical attention. |
| Ingestion | IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Get Medical advice and/or attention if you feel unwell. |
| Most important symptoms/effects, acute and delayed | Eye irritation. Symptoms may include stinging, tearing, redness, swelling and blurred vision. Skin irritation: May cause redness, itching and/or pain. Inhalation of mist/vapors: Prolonged or repeated exposure may cause chronic effects. |
| Indication of immediate medical attention and special treatment needed | Provide general supportive measures and treat symptomatically. |

SECTION 5: FIRE-FIGHTING MEASURES

This material is water based and is not combustible under normal conditions. If the material is exposed to sufficient heat for sufficient time to evaporate the water, combustion may occur.

Suitable Extinguisher type(s) Use carbon dioxide (CO2), alcohol foam, water fog or dry chemical to extinguish.

Unsuitable Extinguisher type Do not use stream or jet of water as this will spread fire.

| | |
|--|--|
| Specific hazardous arising from fire. | Vaporized material may form explosive mixture with air. Thermal decomposition (burning) will produce oxides of carbon including carbon monoxide and may also produce irritating, corrosive and/or toxic gases, vapors and fumes. |
| Special protective equipment for fire fighting. | Self-contained breathing apparatus and full protective gear must be worn in case of fire. |

SECTION 6: ACCIDENTAL RELEASE MEASURES

| | |
|---------------------------------|---|
| Leak or spill procedures | Provide adequate ventilation. |
| Containment | Contain and absorb with inert material. (e.g. oil dry, sand) |
| Cleanup | Dispose in accordance with all local, state and federal regulations. |
| Precautions | In the event of a large spill, contain material and recover for use if possible. Avoid discharge into drains, water courses and the ground. |

SECTION 7: HANDLING AND STORAGE

| | |
|----------------------------------|--|
| Storage | Keep from freezing. Keep containers tightly closed. Store in a cool, dry and well ventilated area. |
| Handling | Avoid prolonged or repeated skin contact and avoid breathing vapors. |
| Incompatible Contaminants | Avoid exposure to oxidizing agents. |

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

| | |
|-----------------------------|---|
| Engineering Controls | Use with adequate ventilation. |
| PPE | Eye/Face: Face shield, goggles Skin: Chemical protective gloves. Respiratory: Level of exposure needs to be determined. If required, use a particulate filter, a NIOSH-approved air purifying respirator with organic vapor cartridge or a supplied air respirator. |

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

| | |
|-------------------------------|----------------|
| Appearance | |
| Form | Liquid |
| Color | Black |
| Flammability Limits | |
| Upper | Not applicable |
| Lower | Not applicable |
| Odor | Mild Odor |
| Odor Threshold | Not Determined |
| Vapor Pressure at 20°C | 2.3 kilopascal |
| pH | 8-10 |
| Vapor Density (air=1) | >1 |
| Evaporation Rate | Not Determined |
| Specific Gravity, 16°C | 0.9 to 1.2 |
| Melting Point/Range | 32°F (0°C) |
| Boiling Point/Range | 212°F (100°C) |
| Solubility | Dispersible |
| Partition Coefficient | Not Determined |

| | |
|----------------------------------|--------------------------------|
| Flash Point | Not applicable |
| Flammability | Nonflammable |
| Auto ignition Temperature | Not applicable |
| Decomposition Temperature | Not Determined |
| Viscosity | 40 to 200 mm ² /sec |

SECTION 10: STABILITY AND REACTIVITY

| | |
|-------------------------------|--|
| Reactivity | |
| Chemical Stability | Stable |
| Other | |
| Hazardous Reactions | None known |
| Polymerization | Will not occur. |
| Conditions to Avoid | Freezing and boiling |
| Incompatible Materials | None known |
| Decomposition Hazards | Combustion products: Oxides of carbon, nitrogen, and sulfur and potentially irritating and/or toxic fumes. |

SECTION 11: TOXICOLOGICAL INFORMATION

| | |
|---|--|
| Routes of Exposure | |
| Inhalation | Excessive inhalation of mist may cause blockage of airways. |
| Ingestion | Expect low ingestion hazard. Do NOT induce vomiting. |
| Skin Contact | Causes mild skin irritation |
| Eye Contact | Causes eye irritation |
| Delayed, Immediate, and Long Term Exposure | None known |
| Carcinogenicity | None of the components of this mixture are considered to be a carcinogen by IARC, ACGIH, NTP, OR OSHA. |

SECTION 12: ECOLOGICAL INFORMATION

| | |
|---------------------------|---|
| Eco toxicity | This mixture contains components that are potentially toxic to freshwater and saltwater ecosystems. |
| Environmental Fate | This material may be harmful to aquatic organisms. |

SECTION 13: DISPOSAL CONSIDERATIONS

Hazard characteristic and regulatory waste classification can change with product use. Accordingly, it is the responsibility of the user to determine the proper handling and disposition for disposal according to local, state, federal and international regulations.

SECTION 14: TRANSPORT INFORMATION

For Industrial/Professional Use Only-Keep out of reach of Children. Keep from freezing.

DOT No label required. Not regulated for transport.

Proper shipping name: n/a

Identification Numbers: n/a

Class or Division: n/a

Packing Group: n/a

Label Codes: n/a

Special Provisions: n/a

Packaging

Exceptions: n/a

Non-Bulk: n/a

Bulk: n/a

Quantity Limitations

Passenger Aircraft/Rail: n/a

Cargo Aircraft Only: n/a

Vessel Stowage

Location: n/a

Other: n/a

SECTION 15: REGULATORY INFORMATION

TSCA All components are on the TSCA inventory.

Sara Title III, Section 313 No, None

Sara Title III, Section 311, 312 No, None

SECTION 16: OTHER INFORMATION

The information and recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind expressed or implied is made with respect to the information contained herein.

From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Thursday, May 16, 2024 4:08:00 PM
Attachments: [image001.png](#)
[47811surface_coat_calcs.xlsx](#)

Hi Tim,

Thank you for sending all this information. How did you determine the weight % volatile (water & organics), the weight % water, the volume % water, and the volume % non-volatiles(solids)?

Attached are the calculations that I determined from the information in the MSDS that you sent. Please let me know what you think.

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, May 10, 2024 6:59 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

Attached are the documents and calculations that you requested. Please let me know if you have any questions or need anything else.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Dear Mr. Stickler,

I am the permit writer assigned to the current application No. 087-47811-00084 for Lippert Components Inc. Plant 46. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Lippert Components Inc. Plant 46 would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Madhurima Moulik) may be contacted at 317-233-0043 or mmoulik@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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| | | | |
|--|--|--|--|

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

**Company Name: Lippert Components, Inc., Plant 46
Source Address: 3625 N. State Route 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 | 9.80 | 28.00% | 7.59% | 20.41% | 8.92% | 72.00% | 7.50 | 12.00 | 2160.00 | 2.20 | 2.00 | 180.00 | 4320.00 | 788.40 | 695.37 | 2.78 | 75% |
| Pure Asphalt #7800 | 8.57 | 30.00% | 30.00% | 0.00% | 30.81% | 70.00% | 7.50 | 12.00 | 2160.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 590.87 | 0.00 | 75% |
| Pure Asphalt #8655 | 8.60 | 68.00% | 62.19% | 5.81% | 64.12% | 32.00% | 7.50 | 12.00 | 2160.00 | 1.39 | 0.50 | 45.00 | 1080.00 | 197.10 | 271.21 | 1.56 | 75% |
| Totals | | | | | | | | | 6480.00 | | | 225.00 | 5400.00 | 985.50 | 1557.45 | | |

| | | |
|---|--|--------------|
| Control Efficiency = | | 95.0% |
| Total Controlled Potential to Emit (PTE) (tons/year) = | | 77.87 |

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/day)] * [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]

From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Thursday, May 16, 2024 9:37:41 PM
Attachments: [image003.png](#)
[Re_545.pdf](#)

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Good Evening Victoria,

The specs that you are asking about came to me via email from the manufacturer (see attached). I requested this information since it was not provided in their SDS. However, it does look like in my calculations I made an error in transposing the weight % water. The manufacturer stated “.3” which most probably they meant “30%”. Other than that I would have to defer to the information they provided to me. The contact information of the manufacturer is Tom Nelson, tnelson@pureasphalt.com (312)513-2295. You are more than welcome to contact him if you would like to do so. They may be able to shed more light on this than I can.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 16, 2024 4:08 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Tim,

Thank you for sending all this information. How did you determine the weight % volatile (water & organics), the weight % water, the volume % water, and the volume % non-volatiles(solids)?

Attached are the calculations that I determined from the information in the MSDS that you sent. Please let me know what you think.

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Friday, May 10, 2024 6:59 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

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Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Thursday, May 9, 2024 12:44 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Dear Mr. Stickler,

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Components Inc. Plant 46. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

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Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Madhurima Moulik) may be contacted at 317-233-0043 or mmoulik@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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Whenever, wherever, we make your experience better.

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|---|---|---|---|
|  |  |  |  |
|---|---|---|---|

From: [Tom Nelson](#)
To: [Tim Stickler](#)
Subject: Re: 545
Date: Tuesday, April 23, 2024 5:56:05 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Tim. Here are the numbers you asked for on the 545.

Weight % volatile 2.4 plus or minus .2
Weight% water .3
Weight% by volume 65 plus or minus .2

Sent from my iPhone

On Apr 18, 2024, at 1:22 PM, Tim Stickler <tstickler@lci1.com> wrote:

Good Afternoon Tom,

I am finishing up the VOC PTE calculations for this 545 paint. The TDS is missing a couple pieces of information that I am hoping you can provide. The missing information is below:

1. Weight % Volatile (Water & Organics)
2. Weight % Water
3. Volume % of solids

As soon as I can get the information above I can finish up the calculations, review them with Jeff then submit a Permit Modification to IDEM to hopefully get Plant 46 approved to use the 545 coating.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tom Nelson <tnelson@pureasphalt.com>

Sent: Friday, February 2, 2024 1:15 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: 545

You don't often get email from tnelson@pureasphalt.com. [Learn why this is important](#)

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Tim-Here it is.

Tom Nelson
Pure Asphalt Company
312-513-2295

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, February 2, 2024 12:08 PM
To: Tom Nelson <tnelson@pureasphalt.com>
Subject: RE: 545

Tom,

Do you have a Technical Data sheet for the 545? I want to request that now in case we do need to add it to our emissions tracking program. The Technical Sheet should have VOC content details, the weight, etc.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tom Nelson <tnelson@pureasphalt.com>
Sent: Friday, February 2, 2024 11:14 AM
To: Jeff Holsinger <jholsinger@lci1.com>
Cc: Tim Stickler <tstickler@lci1.com>
Subject: Re: 545



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Thank you. I am available today. Better number is the home office line 608-868-2878.
Better reception here.
Sent from my iPhone

On Feb 2, 2024, at 10:12 AM, Jeff Holsinger <jholsinger@lci1.com> wrote:

Hey Tim545 weights 9.8#'s ger gallon..... 330 tote 3234#'s

I added Tom to this so u both could talk about application so it wasn't coming 2nd hand from me
Cell# 312-513-2295

From: Jeff Holsinger
Sent: Thursday, February 1, 2024 3:12 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: FW: 545

Hey good afternoon

Let me know if we can use this

From: Tom Nelson <tnelson@pureasphalt.com>
Sent: Friday, December 15, 2023 7:56 AM
To: Jeff Holsinger <jholsinger@lci1.com>
Subject: 545

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jeff,

Here is the sds on the 545 HF. This is a solvent based coating. 2.0 lbs voc. Haps free. Flash point in the 125 range so not flammable. I will get back to you on cost.

Tom Nelson
Pure Asphalt Company
312-513-2295



Whenever, wherever, we make your experience better.



Whenever, wherever, we make your experience better.



Whenever, wherever, we make your experience better.



From: [Tamburrino, Victoria](#)
To: tnelson@pureasphalt.com
Subject: Information Request for #545, #8655, and #7800
Date: Friday, May 17, 2024 9:53:00 AM
Attachments: [image001.png](#)

Hi Tom,

I am an IDEM Office of Air Quality permit writer and I am trying to determine calculations for the potential to emit VOC, PM, and HAPs of several Pure Asphalt products. I've been able to determine some of the information needed from the MSDS but there are still some pieces of information I could not find from the MSDS or TDS sheets. Can you confirm the following information for these three materials: #545 Chassis Coating/Undercoating, #8655 Chassis Paint, and #7800 Frame Coating?

- Weight % Volatile (water, VOC, and exempt compounds)
- Weight% Water and exempt compounds (non-VOC)
- Volume % Solids

Thank you!

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Friday, May 17, 2024 9:55:00 AM
Attachments: [image002.png](#)

Hi Tim,

Thank you for your quick response and helpful information. I'll keep you updated as we continue working on preparing the draft documents for this modification.

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Thursday, May 16, 2024 9:36 PM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Good Evening Victoria,

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Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 16, 2024 4:08 PM
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Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Friday, May 10, 2024 6:59 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

Attached are the documents and calculations that you requested. Please let me know if you have any questions or need anything else.

Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Thursday, May 9, 2024 12:44 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Dear Mr. Stickler,

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Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Friday, May 17, 2024 11:48:17 AM
Attachments: [image001.png](#)

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Victoria,

Also, I failed to mention that the source can only use one of these paints at a time. Their system is setup so that both paint guns draw from the same tote of paint.

Thank you,

Tim Stickler

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From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 16, 2024 3:08:29 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Thank you,

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Sent: Friday, May 10, 2024 6:59 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert

Components Inc. Plant 46

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Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Thursday, May 9, 2024 12:44 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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For details on your privacy rights, including how we may gather, use, and share your personal information, please see our privacy notice available [here](#).

From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Friday, May 17, 2024 12:00:00 PM
Attachments: [image003.png](#)

Hi Tim,

Thank you for letting me know; we can then calculate on “worst case” instead of combining them all. I have two additional questions:

1. Can you show me the updated emission unit description (using **bold** and ~~strikethrough~~ for the surface coating operation that will go in section A.2 of the permit?

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2. I noticed that the TSD from the most recent renewal F089-37915-00084 used 3440 (Fabricated Structural Metal Products) for the SIC code and the permit uses 3711 (Motor Vehicles and Passenger Car Bodies). Which is the most accurate SIC code for the source?

Thank you!

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, May 17, 2024 11:48 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

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Fax: 317-232-6749

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From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Tuesday, May 28, 2024 8:56:35 AM
Attachments: [image002.png](#)

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Tori,

See below for revisions to Question #1.

Question #2 – The correct SIC Code for this location is 3440

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Friday, May 17, 2024 12:00 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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

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Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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From: [Tom Nelson](#)
To: [Tamburrino, Victoria](#)
Subject: Fwd: IDEM OAQ Question Regarding Potential to Emit of Several Materials
Date: Wednesday, May 29, 2024 11:50:32 AM
Attachments: [image001.png](#)
[2024.05.29 Tom Nelson requests.xlsx.xlsx](#)

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Sent from my iPhone

Begin forwarded message:

From: Ray Ordonez <rordonez@pureasphalt.com>
Date: May 29, 2024 at 11:43:27 AM EDT
To: Tom Nelson <tnelson@pureasphalt.com>
Subject: RE: IDEM OAQ Question Regarding Potential to Emit of Several Materials

Ray Ordonez
Senior Staff Chemist
Pure Coatings Group
Division of Pure Asphalt
3455 W. 31st. Place
Chicago, IL 60623
1-773-247-7030 ext.107

From: Tom Nelson <tnelson@pureasphalt.com>
Sent: Thursday, May 23, 2024 9:27 AM
To: Ray Ordonez <rordonez@pureasphalt.com>
Subject: Fwd: IDEM OAQ Question Regarding Potential to Emit of Several Materials

Lippert is looking for this info for permit
Sent from my iPhone

Begin forwarded message:

From: "Tamburrino, Victoria" <VTamburr@idem.in.gov>
Date: May 23, 2024 at 9:24:56 AM CDT
To: Tom Nelson <tnelson@pureasphalt.com>

Subject: IDEM OAQ Question Regarding Potential to Emit of Several Materials

Hi Tom,

I apologize for that phone call, I'm going to reach out to our IT department because I can hear the phone ring, but I can't hear anything once someone answers. It's definitely on my end because it's been happening with other calls as well.

Anyway, I am trying to determine the potential to emit calculations for a permit in which the source is using three materials from your manufacturer: Pure Asphalt #545, #7800, and #8655.

Can you please send me the following information for each material? I've looked at the MSDS sheets but can't find all the information I need.

1. Weight % Volatile (water, VOC, and exempt compounds)
2. Weight % Water and Exempt compounds (non-VOC)
3. Volume % Solids
4. Volume % Water and Exempt Compounds

Also, it is my understanding that that each of these three materials are HAPs free. Is that correct?

Thank you,

Tori Tamburrino

Victoria "Tori" Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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| Product ID | 7800 | 8655 |
|--------------------------------------|-------------|-------------|
| Weight % solids (Volatile) | 45.92 | 70.39 |
| Weight % of (water, no voc) | 19.34 | 63 |
| Volume Solids % | 45.2 | 25.81 |
| Volume % (water & exempt) | 23.27 | 64.55 |

| |
|------------|
| 545 |
| 73 |
| 0.28 |
| 65 |
| 2 |

From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Wednesday, May 29, 2024 1:57:00 PM
Attachments: [image002.png](#)

Hi Tim,

Thank you for your response. Upon further review, I noticed that 3440 is actually not an SIC code, but it identifies a group of SIC codes for fabricated metal structural products. Please review the SIC codes and let me know which one best applies.

Here is the link to Group 34 SIC Codes:
<https://www.osha.gov/data/sic-manual/major-group-34>

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Tuesday, May 28, 2024 8:56 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

See below for revisions to Question #1.

Question #2 – The correct SIC Code for this location is 3440

Thank you,

Tim Stickler

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Cell: (260)579-1190

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From: Tim Stickler <tstickler@lci1.com>

Sent: Friday, May 17, 2024 11:48 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Victoria,

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Sent: Thursday, May 16, 2024 3:08:29 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Wednesday, May 29, 2024 2:27:41 PM
Attachments: [image002.png](#)

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SIC Code 3441 best fits this site.
Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

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Sent: Wednesday, May 29, 2024 1:58 PM
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Here is the link to Group 34 SIC Codes:
<https://www.osha.gov/data/sic-manual/major-group-34>

Thank you,
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From: Tim Stickler <tstickler@lci1.com>
Sent: Tuesday, May 28, 2024 8:56 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,
See below for revisions to Question #1.
Question #2 – The correct SIC Code for this location is 3440
Thank you,

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Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Friday, May 17, 2024 12:00 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Monday, June 3, 2024 11:00:00 AM
Attachments: [image002.png](#)
[47811calcs.xlsx](#)

Hi Tim,

Attached are the updated calculations based off of the information provided by the MSDS sheets and what the manufacturer provided. Please let me know if you notice any issues.

Are the new materials already in use by the source?

Thank you,

Tori

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**Appendix A: Emissions Calculations
Emission Summary**

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

| | Unlimited/Uncontrolled Potential to Emit Tons per Year | | | | | | | | | |
|--------------------------|---|---------------|---------------|-----------------|-------------|---------------|-------------|-------------|------------------|-----------|
| Process/Emission Unit | 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 |

| | Limited Potential to Emit Tons per Year | | | | | | | | | |
|--------------------------|--|--------------|--------------|-----------------|-------------|--------------|-------------|-------------|------------------|-----------|
| Process/Emission Unit | 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 Route 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 Route 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 Route 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 Route 9, Howe, IN 46746
 Operating Permit No.: F087-37915-00084
 Revision No.: 087-47811-00084
 Reviewer: Tori Tamburrino

| Heat Input Capacity | Unit Description | HHV | Potential Throughput |
|---------------------|---|-------|----------------------|
| MMBtu/hr | | mmBtu | 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 8/20.15 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 | NO _x | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 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 NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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 Route 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 | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.9E-02 | 1.8E+00 | 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 | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 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 Route 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 NO_x 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).

From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Monday, June 3, 2024 11:20:38 AM
Attachments: [image002.png](#)

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Tori,

I'll review these calcs today. The source purchased and used 1 tote only of the #545 solvent-based paint for a trial which went well, hence the permit modification. The water-based paints (#7800 & #8655) are both being used by the source currently. Right now, the #7800 and #8655 are the only two paints that they are and have been using for the past few years.

The source is looking to use the #545 solvent-based paint on "wet weather" days because over the years the water-based paint has not been holding up during transport to the customers on "wet weather" days. The source therefore, is seeking to use the solvent-based #545 only during periods of "wet weather."

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Monday, June 3, 2024 11:01 AM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Tim,

Attached are the updated calculations based off of the information provided by the MSDS sheets and what the manufacturer provided. Please let me know if you notice any issues.

Are the new materials already in use by the source?

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Wednesday, May 29, 2024 2:27 PM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

SIC Code 3441 best fits this site.

Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Wednesday, May 29, 2024 1:58 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Tim,

Thank you for your response. Upon further review, I noticed that 3440 is actually not an SIC code, but it identifies a group of SIC codes for fabricated metal structural products. Please review the SIC codes and let me know which one best applies.

Here is the link to Group 34 SIC Codes:

<https://www.osha.gov/data/sic-manual/major-group-34>

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Tuesday, May 28, 2024 8:56 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

See below for revisions to Question #1.

Question #2 – The correct SIC Code for this location is 3440

Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Friday, May 17, 2024 12:00 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Thank you for letting me know; we can then calculate on “worst case” instead of combining them all. I have two additional questions:

1. Can you show me the updated emission unit description (using **bold** and ~~strikethrough~~ for the surface coating operation that will go in section A.2 of the permit?

..

- (a) One (1) Surface Coating Operation, identified as EU-01, approved for construction in 2012, 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.

..

2. I noticed that the TSD from the most recent renewal F089-37915-00084 used 3440 (Fabricated Structural Metal Products) for the SIC code and the permit uses 3711 (Motor Vehicles and Passenger Car Bodies). Which is the most accurate SIC code for the source?

Thank you!

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, May 17, 2024 11:48 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Victoria,

Also, I failed to mention that the source can only use one of these paints at a time. Their system is setup so that both paint guns draw from the same tote of paint.

Thank you,

Tim Stickler

Sent from my Verizon, Samsung Galaxy smartphone

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From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 16, 2024 3:08:29 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Thank you for sending all this information. How did you determine the weight % volatile (water & organics), the weight % water, the volume % water, and the volume % non-volatiles(solids)?

Attached are the calculations that I determined from the information in the MSDS that you sent. Please let me know what you think.

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, May 10, 2024 6:59 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

Attached are the documents and calculations that you requested. Please let me know if you have any questions or need anything else.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Dear Mr. Stickler,

I am the permit writer assigned to the current application No. 087-47811-00084 for Lippert Components Inc. Plant 46. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Lippert Components Inc. Plant 46 would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Madhurima Moulik) may be contacted at 317-233-0043 or mmoulik@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria "Tori" Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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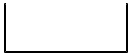
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Whenever, wherever, we make your experience better.



Whenever, wherever, we make your experience better.



From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46
Date: Tuesday, June 4, 2024 3:35:34 PM
Attachments: [image002.png](#)

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Tori,

I have reviewed the calculations and they look good to me.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Monday, June 3, 2024 11:01 AM
To: Tim Stickler <tstickler@lci1.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Attached are the updated calculations based off of the information provided by the MSDS sheets and what the manufacturer provided. Please let me know if you notice any issues.

Are the new materials already in use by the source?

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Wednesday, May 29, 2024 2:27 PM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

SIC Code 3441 best fits this site.

Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Wednesday, May 29, 2024 1:58 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Thank you for your response. Upon further review, I noticed that 3440 is actually not an SIC code, but it identifies a group of SIC codes for fabricated metal structural products. Please review the SIC codes and let me know which one best applies.

Here is the link to Group 34 SIC Codes:

<https://www.osha.gov/data/sic-manual/major-group-34>

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Tuesday, May 28, 2024 8:56 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

See below for revisions to Question #1.

Question #2 – The correct SIC Code for this location is 3440

Thank you,

Tim Stickler

Corp. Environmental Director

Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Friday, May 17, 2024 12:00 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Thank you for letting me know; we can then calculate on “worst case” instead of combining them all. I have two additional questions:

1. Can you show me the updated emission unit description (using **bold** and ~~strikethrough~~ for the surface coating operation that will go in section A.2 of the permit?

..

- (a) One (1) Surface Coating Operation, identified as EU-01, approved for construction in 2012, 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.

..

2. I noticed that the TSD from the most recent renewal F089-37915-00084 used 3440 (Fabricated Structural Metal Products) for the SIC code and the permit uses 3711 (Motor Vehicles and Passenger Car Bodies). Which is the most accurate SIC code for the source?

Thank you!

Tori

From: Tim Stickler <tstickler@lci1.com>

Sent: Friday, May 17, 2024 11:48 AM

To: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Subject: Re: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Victoria,

Also, I failed to mention that the source can only use one of these paints at a time. Their system is setup so that both paint guns draw from the same tote of paint.

Thank you,

Tim Stickler

Sent from my Verizon, Samsung Galaxy smartphone

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From: Tamburrino, Victoria <VTamburr@idem.IN.gov>

Sent: Thursday, May 16, 2024 3:08:29 PM

To: Tim Stickler <tstickler@lci1.com>

Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Hi Tim,

Thank you for sending all this information. How did you determine the weight % volatile (water & organics), the weight % water, the volume % water, and the volume % non-volatiles(solids)?

Attached are the calculations that I determined from the information in the MSDS that you sent. Please let me know what you think.

Thank you,

Tori

From: Tim Stickler <tstickler@lci1.com>
Sent: Friday, May 10, 2024 6:59 AM
To: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46

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Tori,

Attached are the documents and calculations that you requested. Please let me know if you have any questions or need anything else.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, May 9, 2024 12:44 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: IDEM OAQ Contact Information for Application No. 087-47811-00084 for Lippert Components Inc. Plant 46



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Dear Mr. Stickler,

I am the permit writer assigned to the current application No. 087-47811-00084 for Lippert Components Inc. Plant 46. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information

at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Lippert Components Inc. Plant 46 would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Madhurima Moulik) may be contacted at 317-233-0043 or mmoulik@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her
Environmental Manager, Office of Air Quality, Permits Branch
[IN Department of Environmental Management](#)
Phone: (317) 233-0043
Fax: 317-232-6749
Email: vtamburr@idem.in.gov

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From: [Tamburrino, Victoria](#)
To: [Tim Stickler](#)
Subject: Applicant Review for FESOP Significant Permit Revision No. 087-47811-00084 for Lippert Components, Inc.
Date: Thursday, June 13, 2024 1:18:00 PM
Attachments: [image001.png](#)
[47811calcs.xlsx](#)
[47811let.docx](#)
[47811per.docx](#)
[47811pn.docx](#)
[47811tsd.docx](#)
Importance: High

Dear Mr. Stickler:

Attached is the draft FESOP Significant Permit Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

The time clock for FESOP Significant Permit Revision No.: 087-47811-00084 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted **two (2) weeks** from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before **June 28, 2024**, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review and that you are able to access these files in their current format.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$5,556, which is based on the following:

| | |
|---------|--|
| \$5,556 | example: FESOP Significant Permit Revision (Minor for PSD) |
|---------|--|

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,

Tori Tamburrino

Victoria "Tori" Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

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**Appendix A: Emissions Calculations
Emission Summary**

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

| Heat Input Capacity | Unit Description | HHV | Potential Throughput |
|---------------------|---|-------|----------------------|
| MMBtu/hr | | mmBtu | 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 | NO _x | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 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 NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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 Route 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 | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.9E-02 | 1.8E+00 | 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 | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 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 Route 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 NO_x 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

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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 Route 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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Commissioner

Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Lippert Components, Inc., Plant 46
3625 N. State Route 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 Route 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 Route 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 Route 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 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) |
| | | | |
| | | | |
| | | | |

- 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 Route 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

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Eric J. Holcomb
Governor

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 Route 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

**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/>.

From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: Applicant Review for FESOP Significant Permit Revision No. 087-47811-00084 for Lippert Components, Inc.
Date: Thursday, June 13, 2024 1:44:48 PM
Attachments: [image001.png](#)

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Tori,

I have received the DRAFT documents you provided. We will review and provide comments within the allotted 2 week review period.

Thank you,

Tim Stickler

Corp. Environmental Director
Cell: (260)579-1190

From: Tamburrino, Victoria <VTamburr@idem.IN.gov>
Sent: Thursday, June 13, 2024 1:18 PM
To: Tim Stickler <tstickler@lci1.com>
Subject: Applicant Review for FESOP Significant Permit Revision No. 087-47811-00084 for Lippert Components, Inc.
Importance: High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Stickler:

Attached is the draft FESOP Significant Permit Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

The time clock for FESOP Significant Permit Revision No.: 087-47811-00084 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted **two (2) weeks** from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before **June 28, 2024**, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review and that you are able to access these files in their current format.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$5,556, which is based on the following:

| | |
|---------|--|
| \$5,556 | example: FESOP Significant Permit Revision (Minor for PSD) |
|---------|--|

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,

Tori Tamburrino

Victoria “Tori” Tamburrino | She/Her

Environmental Manager, Office of Air Quality, Permits Branch

[IN Department of Environmental Management](#)

Phone: (317) 233-0043

Fax: 317-232-6749

Email: vtamburr@idem.in.gov

Help us improve!

IDEM values your feedback



Whenever, wherever, we make your experience better.



From: [Tim Stickler](#)
To: [Tamburrino, Victoria](#)
Subject: RE: Applicant Review for FESOP Significant Permit Revision No. 087-47811-00084 for Lippert Components, Inc.
Date: Friday, June 14, 2024 2:18:07 PM
Attachments: [image001.png](#)

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Tori,

We have completed our review of the draft documents and we have no comments. Everything looks fine to us.

Thank you,

Tim Stickler

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Environmental Manager, Office of Air Quality, Permits Branch

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