INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 12, 2007

RE: Lippert Components, Inc. - Indiana Frame Division / 039-24309-00309

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06

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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Lippert Components, Inc-Indiana Frame Division
16700 Skyview Road
Goshen, Indiana 46526

(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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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.: F039-24309-00309	
Issued by: *Original document signed by* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 12, 2007 Expiration Date: July 12, 2012

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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 Mobile home and RV metal frame manufacturing.

Source Address:	16700 Skyview Road, Goshen, Indiana 46526
Mailing Address:	2703 College Avenue, Goshen, Indana 46528
General Source Phone Number:	574-536-1125
SIC Code:	3440
County Location:	Elkhart
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

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This mobile home and RV metal frame manufacturing company consists of four (4) plants identified as Plants 19, 26, 30, and 45:

(a) Plant 19 is located at 16700 Skyview Road, Goshen, Indiana 46526-6420;

(b) Plant 26 is located at 16840 Skyview Road, Goshen, Indiana 46526-6438;

(c) Plant 30 is located at 65781 Sourwood Drive, Goshen, Indiana 46526-9146.

(d) Plant 45 is located at 2703 College Avenue, Goshen, Indiana 46528-5040.

Plant 19 will be the listed source address.

A.3 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) paint booth (EU2) known as the RV frame coating facility, constructed in 1998, equipped with airless spray guns with dry filters for air pollution control.

(b) Seven (7) paint booths known as EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8, constructed in 2005, equipped with airless spray guns with dry filters for air pollution control.

The eight (8) paint booths have a capacity of 8.5 mobile home chassis and 5.0 RV frames per hour.

(c) One (1) shot blasting operation, known as EU3, constructed in 2000, with emissions controlled by a cyclone/cartridge filter dust collector. Capacity: 6,929 pounds of shot per hour.

(d) One (1) shot blasting operation, identified as EU9, to be installed in 2005, with emissions

controlled by a cyclone/cartridge filter dust collector, capacity: 6,929 pounds of shot per hour.

A.4 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, as defined in 326 IAC 2-7-1 (21)

(a) One (98) natural gas-fired combustion sources with heat input of 5.8 million British thermal units per hour.

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(c) Five (5) storage tanks with capacity of less than or equal to 1000 gallons and annual throughout less than 12,000 gallons;

(d) Welding activities emitting less than twenty-five (25) pounds per day of PM_{10}, less than five (5) pounds per day or one (1) ton per year of a single HAP. [326 IAC 6-3-2]

(e) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2000 and one (1) natural gas-fired baking oven, with two burners, with combustion of 3.0 million Btu per hour [326 IAC 6-3-2(e)].

(f) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2006 and one (1) natural gas-fired dry oven, with a combustion of 4.0 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 3.0 million BTU per hour [326 IAC 6-3-2(e)]; and

(g) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2007 and one (1) natural gas-fired water tank, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired dry oven, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 4.0 million BTU per hour [326 IAC 6-3-2(e)].

A.5 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).

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, F039-24309-00309, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, 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 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 the certification 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.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.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 ahealth-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 Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
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 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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) All terms and conditions of permits established prior to F039-24309-00309 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

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

B.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 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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 the certification 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.17 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(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, 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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified 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.19 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) through (d) 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);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 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) through (d). 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)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2and 326 IAC 2-8-11.1.

B.21 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;

(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.22 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification 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.23 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 within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) 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.24 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 whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(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 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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

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

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

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 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 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 Accredited 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 Accredited 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) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 certification 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 certification 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.

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][326 IAC 2-8-5(a)(1)]

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 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.

(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.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on.

(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.15 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.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(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 maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.17 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred twenty (120) 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 the certification 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.18 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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 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. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, 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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) 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.

(f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint booth (EU2) known as the RV frame coating facility, constructed in 1998, equipped with airless spray guns with dry filters for air pollution control.

(b) Seven (7) paint booths known as EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8, constructed in 2005, equipped with airless spray guns with dry filters for air pollution control.

The eight (8) paint booths have a capacity of 8.5 mobile home chassis and 5.0 RV frames per ho

(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 and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4]

The permittee shall comply with the following:

(a) The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM emissions shall be less than 30 tons per twelve consecutive month period, with compliance determined at the end of each month;

(b) The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM_{10} emissions shall be less than 30 tons per twelve consecutive month period, with compliance determined at the end of each month;

(c) The transfer efficiency of paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall not be less than 75%; and

(d) The PM and PM_{10} control efficiency of the dry filters shall not be less than 80%.

Compliance with the above limits in combination with Condition D.2.1, and the potential PM, and PM_{10} emissions from the insignificant activities will limit the sourcewide PM, and PM_{10} emissions to less than 250, and 100 tons per twelve (12) consecutive month period, respectively, and will render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable to this source.

D.1.2 Emission Offset and Part 70 Minor Limits [326 IAC 2-3][326 IAC 2-8-4]

The permittee shall comply with the following:

(a) The VOC input to paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be less than 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

Compliance with the above limit in combination with the potential VOC emissions from the insignificant activities will limit the sourcewide VOC emissions to less than 100 tons per twelve (12) consecutive month period, and will render 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.3 Hazardous Air Pollutants Minor Limit [326 IAC 2-8-4][326 IAC 2-4.1]

The Permittee shall comply with the following:

(a) The input of any single HAP to paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3

and EU8 shall be less than 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and

(b) The input of total HAPs to paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be less than 23 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations in combination with Condition D.3.2, and HAP emission from other insignificant activities at the source will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) not applicable.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the mobile home and RV frames in the eight (8) paint booths known as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum(C_i \times U_i) / \sum U_i]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C_i is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U_i is the usage rate of the coating in gallons per day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operation (identified as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8) shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and filters.

Compliance Determination Requirements [2-8-4(d)]

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP limitations contained in Conditions 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 and HAPs 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.1.8 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-8-4 and 2-2]

Compliance with Condition D.1.1(a) shall be determined by calculating the PM/PM_{10} emissions associated with each coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 using the following equation:

$$PM/PM_{10}\ \text{Emissions} = \sum CU_i \times D_i \times W\%S_i \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

PM/PM_{10} Emissions = The total PM/PM10 emissions (ton/month).

CU_i = The total coating use (gal coating/month) of a given coating.

D_i = The density (lb coating/gal coating) of a given coating.

$W\%S_i$ = The weight percent solids (lb solids/lb coating) of a given coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall equal 75% or a value determined from the most recent valid compliance demonstration.

CE = The control efficiency (%) of the dry filters. This value shall equal 80% or a value determined from the most recent valid compliance demonstration.

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

D.1.9 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 eight (8) paint booths while one or more of the booths are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Response to Excursions or Exceedances, 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. The Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC and HAPs content and usage limits, and the VOC and HAPs emission limits established in Conditions D.1.2, D.1.3 and D.1.4.

(1) The amount of VOC, and HAPs in each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The volume weighted VOC content of the coating used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC, and HAPs usage for each day; and

(6) The weight of VOCs, and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM/PM_{10} emission limits established in Condition D.1.1.

(1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 calculated in accordance with Condition D.1.7 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A quarterly summary of the monthly PM/PM_{10} emissions from the booths covered by Condition D.1.1(a) calculated in accordance with Condition D.1.8 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Shot Blasting

(c) One (1) shot blasting operation, known as EU3, constructed in 2000, with emissions controlled by a cyclone/cartridge filter dust collector. Capacity: 6,929 pounds of shot per hour.

(d) One (1) shot blasting operation, identified as EU9, to be installed in 2005, with emissions controlled by a cyclone/cartridge filter dust collector, capacity: 6,929 pounds of shot per hour.

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

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

D.2.1 PSD and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4]

The total PM and PM_{10} emissions from the two (2) shot blasting operations, known as EU-3 and EU9, shall be less than 0.299 pounds per hour, each.

Compliance with the above limit in combination with Conditions D.1.1, and the potential PM, and PM_{10} emissions from the insignificant activities will limit sourcewide PM, and PM_{10} emissions to less than 250, and 100 tons per twelve (12) consecutive month period, respectively, and will render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

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

Pursuant to 326 IAC 6-3-2(e) the allowable particulate emission rate from the two (2) shot blasting operations, known as EU-3 and EU9, shall be less than 9.43 pounds per hour, each, when operating at a process weight rate of 3.46 tons per hour. The pounds per hour limit was calculated using the following equation:

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

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

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The cyclone/cartridge filter dust collectors for PM and PM_{10} control shall be in operation and control emissions from the two (2) shot blasting operations, known as EU-3 and EU9, at all times that any shot blaster is in operation.

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

D.2.4 Visible Emissions Notations

(a) Visible emission notations of the cyclone/cartridge filter dust collector exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the cyclone/cartridge filter dust collector stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g the process did not operate that day).

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(e) Welding Activities (322 Welding Electrodes) with a combined capacity of 541 pounds per hour

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

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

D.3.3 Particulate Matter (Particulate Emission Limitation for Manufacturing Process) [326 IAC 6-3-2]

Pursuant to SPR 039-9351-00309, issued on April 30, 1998, 326 IAC 6-3-2(e) and revised by this permit, the particulate from the welding activities at the source shall be less than 1.7 pounds per hour when operating at a process weight rate of 0.27 tons per hour. This limit was based upon the following:

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

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(f) Welding activities emitting less than twenty-five (25) pounds per day of PM_{10}, less than five (5) pounds per day or one (1) ton per year of a single HAP.

(g) One (1) powder coating operation consisting of a powder coating booth with maximum capacity of 100 pounds of powder per hour, constructed in 2000 and one (1) natural gas-fired baking oven, with two burners, with combustion of 3.0 million Btu per hour [326 IAC 6-3-2(e)].

(h) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2006 and one (1) natural gas-fired dry oven, with a combustion of 4.0 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 3.0 million BTU per hour [326 IAC 6-3-2(e)]; and

(i) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2007 and one (1) natural gas-fired water tank, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired dry oven, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 4.0 million BTU per hour [326 IAC 6-3-2(e)].

(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.4.1 Particulate Matter (Particulate Emission Limitation for Manufacturing Process) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the PM emissions from the insignificant welding activity shall not exceed the limit determined by the:

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

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

D.4.2 Particulate Matter (Particulate Emission Limitation for Manufacturing Process) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the PM emissions from the insignificant powder coating activity shall be less than 0.551lb/hr.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309

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:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309
Facility: Eight (8) paint booths, identified as as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8
Parameter: PM
Limit: Total PM emissions shall be less than 30 tons per twelve consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309
Facility: Eight (8) paint booths, identified as as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8
Parameter: PM10
Limit: Total PM10 emissions shall be less than 30 tons per twelve consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	Lippert Components, Inc-Indiana Frame Division
Source Address:	16700 Skyview Road, Goshen, Indiana 46526
Mailing Address:	2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.:	F039-24309-00309
Facility:	Eight (8) paint booths, identified as as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8
Parameter:	VOC
Limit:	Total VOC usage shall be less than 99 tons per twelve consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309
Facility: Sourcewide
Parameter: HAPs Limit
Limit: Less than 9 tons for any single HAP and less than 23 tons for total HAPs per twelve consecutive month period.

YEAR:_____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
Month 1	Single HAP (tons)	Total HAPs (tons)	Single HAP (tons)	Total HAPs (tons)	Single HAP (tons)	Total HAPs (tons)
Month 2						
Month 3						

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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:	

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: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Lippert Components, Inc-Indiana Frame Division
Source Location:	16700 Skyview Road, Goshen, IN 46526
County:	Elkhart
SIC Code:	3440
Permit Renewal No.:	F039-24309-00309
Permit Reviewer:	Josiah Balogun

On June 6, 2007, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Lippert Components, Inc-Indiana Frame Division had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a mobile home and RV metal frame manufacturing facility. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the FESOP permit. (deleted language appears as ~~strikout~~.)

Change 1: The typo in Actual Emissions table of TSD has been corrected.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 **emission data.**

Change 2: The Total PM and PM emissions in the Potential To Emit table of TSD is clarified.

.....

	Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Eight (8) Paint Booths	Less than 30	Less than 30	-	Less than 99.0	-	-	Single, less than 9 and total less than 23
(2) Shot Blast, Alum oxide	0.52	0.36	-	-	-	-	-
Welding (Insignificant Activity)	56.1	56.1	-	-	-	-	2.09
(3) Paint Booths Stations	9.87	9.87	-	-	-	-	-
Other Insignificant Activity	0.2	0.8	0.1	0.6	8.8	10.5	0.2
Total Emissions	Less than ~~100~~ **96.7**	Less than ~~100~~ **97.1**	0.1	Less than ~~100~~ **99.6**	8.8	10.5	Single less than 10 and total less than 25

.....

Change 3: A method to demonstrate compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating) has been included.

TSD

326 IAC 8-2-9 (Miscellaneous Metal Coating)

.....

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum(C_i \times U_i) / \sum U_i]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C_i is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U_i is the usage rate of the coating in gallons per day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

~~Based on the MSDS submitted by the source and calculations made, the paint booths are in compliance with this requirement~~.

Therefore, Condition D.1.4 has been revised as follows:

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the mobile home and RV frames in the eight (8) paint booths known as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum(C_i \times U_i) / \sum U_i]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C_i is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U_i is the usage rate of the coating in gallons per day.

.....

Change 4: Condition D.1.1 has been revised to show separate limits for PM and PM_{10} as follows:

D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4]
The permittee shall comply with the following:

(a) The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM~~/ PM_{10}~~ emissions shall be less than 30 tons per twelve consecutive month period, with compliance determined at the end of each month;

(b) **The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM_{10} emissions shall be less than 30 tons per twelve consecutive month period, with compliance determined at the end of each month;**

~~(b)~~ **(c)** The ~~PM/ PM_{10}~~ transfer efficiency of paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall not be less than 75%; and

~~(c)~~ **(d)** The PM and PM_{10} control efficiency of the dry filters shall not be less than 80%.

.....

Change 5: Separate reporting form for PM and PM_{10} have been included in the permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	Lippert Components, Inc-Indiana Frame Division
Source Address:	16700 Skyview Road, Goshen, Indiana 46526
Mailing Address:	2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.:	F039-24309-00309
Facility:	Eight (8) paint booths, identified as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8
Parameter:	PM~~/PM_{10}~~
Limit:	Total PM~~/PM_{10}~~ emissions shall be less than 30 tons per twelve consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Lippert Components, Inc-Indiana Frame Division
Source Address: 16700 Skyview Road, Goshen, Indiana 46526
Mailing Address: 2703 College Avenue, Goshen, Indana 46528
FESOP Permit No.: F039-24309-00309
Facility: Eight (8) paint booths, identified as EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8
Parameter: PM_{10}
Limit: Total PM_{10} emissions shall be less than 30 tons per twelve consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Lippert Components, Inc-Indiana Frame Division
Source Location:	16700 Skyview Road, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3440
Permit Renewal No.:	F039-24309-00309
Permit Reviewer:	Josiah Balogun

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Lippert Components, Inc-Indiana Frame Division, relating to the operation of a mobile home and RV metal frame manufacturing source.

History

On February 12, 2007, Lippert Components, Inc-Indiana Frame Division submitted applications to the OAQ requesting to renew its operating permit. Lippert Components, Inc-Indiana Frame Division was issued FESOP 039-14172-00309, on November 27, 2002.

Source Definition

The mobile home and RV metal frame manufacturing company consists of four (4) plants:

(a) Plant 19 is located at 16700 Skyview Road, Goshen, Indiana 46526;

(b) Plant 26 is located at 16840 Skyview Road, Goshen, Indiana 46526;

(c) Plant 30 is located at 65781 Sourwood Drive, Goshen, Indiana 46526; and

(d) Plant 45 is located at 2703 College Avenue, Goshen, Indiana 46526

Since the four (4) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. This determination was made in the review of Administrative Amendment 039-20896-00309.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) paint booth (EU2) known as the RV frame coating facility, constructed in 1998, equipped with airless spray guns with dry filters for air pollution control, capacity: 5.0 RV frames per hour.

(b) Seven (7) paint booths known as EU4, EU5, EU6, EU7.1, EU7.2 EU7.3 and EU8, constructed in 2005, equipped with airless spay guns with dry filters for air pollution control.

The eight (8) paint booths have a capacity of 8.5 mobile home chassis and 5.0 RV frames per hour.

(c) One (1) shot blasting operation, known as EU3, constructed in 2000, with emissions controlled by a cyclone/cartridge filter dust collector. Capacity: 6,929 pounds of shot per hour.

(d) One (1) shot blasting operation, identified as EU9, constructed in 2005, with emissions controlled by cyclone/cartridge filter dust collector, capacity: 6.929 pounds of shot per hour

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

No unpermitted emission units are operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

(a) One (1) paint booth (EU1) known as the mobile home frame (Mobe) coating facility, constructed in 1995, equipped with airless spray guns with dry filters for air pollution control, capacity: 8.5 mobile home chassis per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (96) natural gas-fired combustion sources with a total heat input of 5.8 million British thermal units per hour;

(b) Paved and unpaved roads and parking lots with public access;

(c) Five (5) storage tanks with capacity of less than or equal to 1000 gallons and annual throughout less than 12,000 gallons;

(d) Welding activities emitting less than twenty-five (25) pounds per day of PM_{10}, less than five (5) pounds per day or one (1) ton per year of a single HAP. [326 IAC 6-3-2];

(e) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2000 and one (1) natural gas-fired baking oven, with two burners, with combustion of 3.0 million Btu per hour [326 IAC 6-3-2(e)];

(f) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2006 and one (1) natural gas-fired dry oven, with a combustion of 4.0 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 3.0 million BTU per hour [326 IAC 6-3-2(e)]; and

(g) One (1) powder coating operation consisting of a powder coating booth with a maximum capacity of 100 pounds of powder per hour, constructed in 2007 and one (1) natural gas-fired water tank, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired dry oven, with a combustion of 3.5 million Btu per hour and one (1) natural gas-fired baking oven, with two burners, with a combustion of 4.0 million BTU per hour [326 IAC 6-3-2(e)].

Existing Approvals

Since the issuance of the FESOP 039-14172-00309 on November 27, 2002 the source has constructed or has been operating under the following approvals as well:

(a) AA 039-19111-00309, issued on May 26, 2004;

(b) AA 039-20896-00309, issued on August 22, 2005;

(c) AA 039-21894-00309, issued on November 16, 2005;

(d) AA 039-22773-00309, issued on April 12, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
EU2	Dry filter	22	3	15,000	Ambient
EU4	Dry filter	30	3	15,000	Ambient
EU5	Dry filter	30	3	15,000	Ambient
EU6	Dry filter	30	2.5	10,000	Ambient
EU7.1	Dry filter	20	3	Unknown	Ambient
EU7.2	Dry filter	20	2	Unknown	Ambient
EU7.3	Dry filter	20	2	Unknown	Ambient
EU8	Dry filter	30	3	Unknown	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations. (Pages 1 through 8).

County Attainment Status

The source is located in Elkhart County

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NOx	attainment
8-hour Ozone	Basic non-attainment
CO	attainment
Lead	attainment

(a) Elkhart County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	366
PM-10	337
SO_2	0.1
VOC	132
CO	8.8
NOx	10.5
Lead	< 5

HAPs	tons/year
Toluene	11.1
MIBK	138
Benzene	0.000037
Dichlorobenzene	0.000021
Formaldehyde	0.0013
Hexane	0.032
Cadmium	0.00002
Chromium	0.000025
Maganese	2.09
Nickel	0.000037
Lead	0.000009
Total	151.3

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7.

However, the source has agreed to limit their PM_{10}, and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	2
SO_2	0
VOC	16
CO	0
NO_x	0
HAP	0

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Eight (8) Paint Booths	Less than 30	Less than 30	-	Less than 99.0	-	-	Single, less than 9 and total less than 23
(2) Shot Blast, Alum oxide	0.52	0.36	-	-	-	-	-
Welding (Insignificant Activity)	56.1	56.1	-	-	-	-	2.09
(3) Paint Booths Stations	9.87	9.87	-	-	-	-	-
Other Insignificant Activity	0.2	0.8	0.1	0.6	8.8	10.5	0.2
Total Emissions	Less than 96.7	Less than 97.1	0.1	Less than 99.6	8.8	10.5	Single less than 10 and total less than 25

(a) This existing stationary source is not major for PSD because the emissions of each attainment pollutant and PM are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is not major for Emission Offset because the emissions of VOC and NOx are less than one hundred (<100) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit renewal for this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Because the source was constructed in 1995, is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and had uncontrolled potential to emit of PM greater than 250 tons per year, 326 IAC 2-2 (Prevention of Significant Deterioration) could be applicable. However, all PM and PM_{10} emissions from the paint booths and shot blasters from the original construction and subsequent source modifications have been controlled by dry filters and the cyclone/cartridge filter dust collectors respectively, and permitted PM and PM_{10} emission levels have never exceeded 250 and 100 tons per year respectively. Therefore, federally enforceable PM and PM_{10} emissions limits of 250 and 100 tons per year, respectively, will be established by this permit to render 326 IAC 2-2 not applicable. These limits will also render 326 IAC 2-7 not applicable to this source.

The following enforceable emission limits have been established for PM, and PM_{10} emissions:

(a) The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM emissions shall not exceed 30 tons per twelve consecutive month period, with compliance determined at the end of each month;

(b) The coating applied by paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited such that total PM_{10} emissions shall not exceed 30 tons per twelve consecutive month period, with compliance determined at the end of each month;

(c) PM/PM_{10} emissions associated with each coating applied by paint booths EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be determined by the following equation:

$$PM/PM_{10} \text{ emissions} = \sum CU_i \times D_i \times W\%S_i \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

PM/PM_{10} = The total PM/PM_{10} emissions (ton/month).

CU_i = The total coating use (gal coating/month) of a given coating.

D_i = The density (lb coating/gal coating) of a given coating.

$W\%S_i$ = The weight percent solids (lb solids/lb coating) of a given coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall equal 75%.

CE = The control efficiency (%) of the dry filters. This value shall equal 80%.

(d) The total PM/PM_{10} emissions from the two (2) shot blasting operations, known as EU-3 and EU9, shall be less than 0.6 pounds per hour, each.

Compliance with the above limits in combination with potential PM, and PM_{10} emissions from the insignificant activities will limit the sourcewide PM, and PM_{10} emissions to less than 250, and 100 tons per twelve (12) consecutive month period, respectively, and will render 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-3 (Emission Offset)

The uncontrolled VOC emissions are more than 100 tons per year for this source.
The VOC input to paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited to less than 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit in combination with potential VOC emissions from the insignificant activities will limit the sourcewide VOC emissions to less than 100 tons per twelve (12) consecutive month period and will render 326 IAC 2-3 (Emission Offset) not applicable to this source.

326 IAC 2-6-1 (Emission Reporting)

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement is removed from the permit.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} and VOC shall be limited to less than one hundred (100) tons per year. The PM_{10} limits established in 326 IAC 2-2 and VOC limits established in 326 IAC 2-3 will also satisfy requirements for FESOP. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

Pursuant to 326 IAC 2-8-4, the HAP emissions from this source shall be limited as follows:

(1) The amount of hazardous air pollutants (HAPs) used in the surface coating operations shall be limited as follows:

(A) The input of any single HAP shall be less than 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and

(B) The input of any combination of HAPs shall be less than 23 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will ensure that the potential to emit of any single HAP from the entire source will be less than 10 tons per year and the potential to emit of a combination of HAPs from the entire source will be less than 25 tons per year.

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:

(a) Opacity shall not exceed an average of forty percent (40%) 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 Part 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.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Work Practices and Control Technologies)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Work Practices and Control Technologies) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations).

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be controlled by dry filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.

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

(a) Pursuant to Administrative Amendment F039-21894-00309, issued on November 16, 2005 and 326 IAC 6-3-2(e), the particulate from the shot blasting operation (EU3 and EU9) shall less than 9.43 pounds per hour each when operating at a process weight rate of 3.46 tons per hour. This pounds per hour limitation is based upon the following:

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

$$E = 4.10\ P^{0.67}$$

where

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The cyclones shall be in operation at all times the shot blaster is in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the PM emissions for the powder coating shall not exceed 0.551 lb/hr.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths EU2, EU4, EU5, EU6, EU7.1, EU7.2, EU7.3 and EU8 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint booths are in compliance with this requirement.

Testing Requirements

Testing is not required for the welding operations because this permit includes record keeping requirements that will ensure compliance with PM_{10} and HAP emission limitations.

Testing is not required for VOC or HAP, from the surface coating operations because this permit includes record keeping requirements that will ensure compliance with VOC and HAP, emission limitations.

PM/PM_{10} testing from paint booths and shot blasting operation are not required, because controlled emissions are very small compared to the enforceable FESOP limit

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance monitoring requirements applicable to this source are as follows:

(a) Surface coating

Emission Units	Frequency	Monitoring
Eight (8) Paint Booths (Dry Filters)	Daily	Inspection shall be perform to verify the placement, integrity, and particle loading of the dry filters.
Eight (8) Paint Booths (Dry Filters)	Weekly	Observation shall be made of the over spray from the spray booth stack to monitor the performace of the dry filters
Eight (8) Paint Booths (Dry Filters)	Monthly	Inspection shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground.

(b) Shot Blasting

Emission Units	Parameter	Frequency	Range	Excursions and Exceedances
Shot Blasting Unit EU3 and EU9 (Cartridge Filters)	Water Pressure drop	Daily	4 to 8 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 February 12, 2007.

Conclusion

The operation of this Lippert Components, Inc shall be subject to the conditions of the attached FESOP No. F 039-24309-00309.

Appendix A: Emissions Calculations
Welding

Company Name: Lippert Components, Inc
Address City IN Zip: 16700 Skyview Road, Goshen, IN 46526
Permit Number: F039-24309-00309
Reviewer: Josiah Balogun
Date: 20-Apr-2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption (lbs/hr)	Emission factors lb pollutant/lb electrode		PM/PM10 (tons/yr)	HAPS tons/yr
WELDING				PM/PM10	Mn		Mn
Metal Inert Gas (MIG)(carbon steel	222	2	444.00	0.0241	0.0009	46.87	1.75
Metal Inert Gas (MIG)(carbon steel	37	0.359	13.28	0.0241	0.0009	1.40	0.05
Metal Inert Gas (MIG)(carbon steel	3	1.1536	3.46	0.0241	0.0009	0.37	0.01
Metal Inert Gas (MIG)(carbon steel	2	1.4526	2.91	0.0241	0.0009	0.31	0.01
Metal Inert Gas (MIG)(carbon steel	1	8.7891	8.79	0.0241	0.0009	0.93	0.03
Metal Inert Gas (MIG)(carbon steel	1	1.1719	1.17	0.0241	0.0009	0.12	0.00
Metal Inert Gas (MIG)(carbon steel	2	1.4832	2.97	0.0241	0.0009	0.31	0.01
Metal Inert Gas (MIG)(carbon steel	2	1.4626	2.93	0.0241	0.0009	0.31	0.01
Metal Inert Gas (MIG)(carbon steel	4	0.2604	1.04	0.0241	0.0009	0.11	0.00
Stick (E7018 electrode)	48	1.0599	50.88	0.0241	0.0009	5.37	0.20
Total	322		541			56.1	2.09

METHODOLOGY
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
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/day x 1 ton/2,000 lbs.
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.

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

Company Name: Lippert Components, Inc
Address City IN Zip: 16700 Skyview Road, Goshen, IN 46526
Permit Number: F039-24309-000309
Reviewer: Josiah Balogun
Date: 20-Apr-07

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
24.0	210.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	10.5	0.6	8.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
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 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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

Company Name: Lippert Components, Inc
Address City IN Zip: 16700 Skyview Road, Goshen, IN 46526
Permit Number: F039-24309-000309
Reviewer: Josiah Balogun
Date: 20-Apr-07

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.208E-04	1.261E-04	7.884E-03	1.892E-01	3.574E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.256E-05	1.156E-04	1.472E-04	3.995E-05	2.208E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Baghouse Operations - Pneumatic Blasting

Company Name: Lippert Components, Inc.
Address City IN Zip: 16700 Skyview Drive, Goshen, Indiana 46526
Permit Number F039-24309-00309
Reviewer: Josiah balogun
Date: 20-Apr-2007

Process	Control Efficiency	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Shot Blasting, Alum. Oxide, PM	99.00%	0.0173	800.0	51.96	0.119	0.520
Shot Blasting, Alum. Oxide, PM10	99.00%	0.0121	800.0	36.34	0.083	0.363
Shot Blasting, Steel Shot, PM	99.00%	0.0103				
Shot Blasting, Steel Shot, PM 10	99.00%	0.0089				

Note: Shot Blasting will utilize either aluminum oxide or steel shot, not both simultaneously. Emissions from blasting with aluminum oxide will be used for

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

The worst case was the Shot Blast ,Aluminum Oxide for both PM and PM10

Appendix A: Emission Calculations
HAP Emissions
From Surface Coating Operations

Company Name: Lippert Components, Inc.
Address City IN Zip: 16700 Skyview Dr., Goshen, IN 45626
Permit Number: F039-24309-00309
Reviewer: Josiah Balogun
Date: 20-Apr-2007

Total Potential HAP Emissions

Material	Density (Lb/Gal)	Gal of Mat (gal/unit) (1)	Maximum (unit/hour) (2)	Weight % Toluene	Weight % MIBK	Toluene Emissions (ton/yr)	Methyl isobutyl ketone (MIBK)(ton/yr)
Z Shield 7800	9.54	2.760000	1.50	1.20%	19.20%	2.08	33.21
Reynco 118-30	8.71	0.109000	100.00	1.20%	19.20%	4.99	79.84
Fast Dry 2500	9.79	0.665000	1.00	1.20%	19.20%	0.34	5.47
11061 Gloss BA	8.37	0.121000	11.00	1.20%	19.20%	0.59	9.37
Krylon SFB	6.25	0.205000	11.00	5.00%	16.90%	3.09	10.43
					Potential Emissions	11.08	138.33
					Total Potential Emissions	149.41	

(1) Gallons per unit is expressed here as gallons per linear foot (gal/linear foot).
(2) Units per hour is expressed here as linear feet per hour (linear feet/hour).

METHODOLOGY

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

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Lippert Components, Inc.
Address City IN Zip: 16700 Skyview Dr., Goshen, IN 46526
Permit Number: F039-24309-00309
Reviewer: Josiah Balogun
Date: 20-Apr-07

Potential Emissions (uncontrolled):

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit) (1)	Maximum (unit/hour) (2)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Reynco Coating	Mobile Line (EU2)	8.71	64.00%	63.42%	0.58%	66.33%	30.00%	0.109	100.00	0.2	0.05	0.55	13.22	2.41	74.85	0.34	0.5
Z Shield 7800	RV Line (EU3)	9.54	38.50%	3.50%	35.00%	4.01%	45.70%	2.760	1.50	3.5	3.34	13.82	331.76	60.55	53.19	14.61	0.5
Fast Dry 2500	RV Line (EU3)	9.79	35.64%	0.00%	35.64%	0.00%	49.00%	0.665	1.00	3.5	3.49	2.32	55.69	10.16	9.18	14.24	0.5
11061 Gloss BA	RV Line (EU3)	8.37	81.00%	21.00%	60.00%	21.00%	17.00%	0.121	11.00	6.4	5.02	6.68	160.42	29.28	4.64	59.08	0.5
Krylon SFB	RV Line (EU3)	6.25	90.24%	43.00%	47.24%	41.00%	7.00%	0.205	11.00	5.0	2.95	6.66	159.79	29.16	3.01	84.36	0.5
Uncontrolled (worst-case) Emissions Emissions												**30.05**	**720.88**	**131.56**	**144.87**		

Potential Emissions (controlled):

	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Controlled (Worst-case) Emissions	0.00%	90.00%	**30.05**	**720.88**	**131.56**	**14.49**

(1) Gallons per unit is expressed here as gallons per linear foot (gal/linear foot).
(2) Units per hour is expressed here as linear feet per hour (linear feet/hour).
* Total potential uncontrolled and controlled VOC and PM emissions are based on worst-case coatings for each booth. The White A.D. Enamel was used for the RV booth (E-3).

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) * Transfer Efficiency
Total = Sum of Worst Case Coatings for each booth.
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emissions Calculations
Emission Summary

Source Name: Lipperts Components, Inc
Source Location: 16700 Skyview Road, Goshen, Indiana 46526
Permit Number: F039-24309-00309
Permit Reviewer: Josiah Balogun
Date: 20-Apr-2007

Uncontrolled Potential Emissions (tons/year)							
	PM	**PM 10**	**SO2**	**VOC**	**CO**	**NOx**	**HAPs**
Emission Unit							
Eight (8) paint booths	144.87	144.87	0	131.6	0	0	149
Shot Blast, Alum. Oxide	52	36.3	0	0	0	0	0
Welding (Insignificant Activity)	56.1	56.1	0	0	0	0	2.09
(3) Paint Booths Stations	9.8	9.8	0	0	0	0	0
Other Insignificant Activity	0.2	0.8	0.1	0.6	8.8	10.5	0.2
Total Emissions (tons/yr)	366.1	337.0	0.1	132.2	8.8	10.5	151.3

Controlled Potential Emissions (tons/year)							
	PM	**PM 10**	**SO2**	**VOC**	**CO**	**NOx**	**HAPs**
Emission Unit							
Eight (8) paint booths	14.5	14.5	0	131.6	0	0	149
Shot Blast, Alum. Oxide	0.52	0.36	0	0	0	0	0
Welding (Insignificant Activity)	56.1	56.1	0	0	0	0	2.09
(3) Paint Booths Stations	9.87	9.87	0	0	0	0	0
Other Insignificant Activity	0.2	0.8	0.1	0.6	8.8	10.5	0.2
Total Emissions (tons/yr)	81.5	81.9	0.1	132.2	8.8	10.5	151.3

Appendix A: Emissions Calculations
Emission Summary

Source Name: Lipperts Components, Inc
Source Location: 16700 Skyview Road, Goshen, Indiana 46526
Permit Number: F039-24309-00309
Permit Reviewer: Josiah Balogun
Date: 20-Apr-2007

Limited Potential Emissions

	PM	PM10	SO2	VOC	CO	Nox	HAPs
Emission Unit			**(tons/year)**				
Eight (8) paint booths	less than 30	less than 30	0	less than 99	0	0	Single less than 9 and total less than 23
(2) Shot Blast, Alum. Oxide	2.62	2.62	0	0	0	0	0
Welding (Insignificant Activity)	56.1	56.1	0	0	0	0	2.09
(3) Powder Coating Stations	9.87	9.87	0	0	0	0	0
Other Insignificant Activity	0.2	0.8	0.1	0.6	8.8	10.5	0.2
Total Emissions (tons/yr)	less than 100	Less than 100	0	Less than 100	8.8	10.5	Single less than 10 and total less than 25

PM/PM10 Emissions was calculated from the powder coating operation using this equation;
PM/PM10 = pounds material/hour *0.03 lbs.powder/pound material (1-0.75)
PM/PM10 = 100*0.03 lbs.powder/pound material (1-0.75)
PM/PM10 = 0.75 lb/hour
0.75 lbs/hr *8760 hr/year*1tons/2000 lb =3.29 tons /year for Insignificant Activities