



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 9, 2011

RE: Lippert Components / 039-30631-00712

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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, Suite N 501E, 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
FN-REGIS.dot 1/2/08



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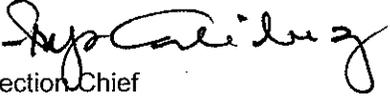
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REGISTRATION OFFICE OF AIR QUALITY

Lippert Components, Inc.
1722 Mishawaka Road
Elkhart, Indiana 46517

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 039-30631-00712	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 9, 2011

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary extruded aluminum parts manufacturer.

Source Address:	1722 Mishawaka Road, Elkhart, Indiana 46517
General Source Phone Number:	(574) 312-6309
SIC Code:	3354 (Aluminum Extruded Products)
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) Powder Coating Booths, identified as Booth 1 and Booth 2, approved for construction in 2011, with a capacity of 3,750 pounds of aluminum per hour and 100 pounds of coating per hour (3,850 pounds total), each, using integral cartridge dust collectors as control, and exhausting indoors.
- (b) Three (3) aluminum extrusion lines, approved for construction in 2011, using no controls, and consisting of:
 - (1) Extruder Line 1, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH1, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO1, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO1, rated at 2.25 million British thermal units per hour.
 - (2) Extruder Line 2, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH2, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO2, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO2, rated at 2.25 million British thermal units per hour.
 - (3) Extruder Line 3, with a capacity of 2,600 pounds of aluminum per hour with the following:

- (A) One (1) natural gas-fired process heater, identified as LH3, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO3, rated at 0.30 million British thermal units per hour.
- (c) One (1) five stage parts washer, approved for construction in 2011, with a maximum capacity of 7,500 pounds of aluminum per hour, consisting of:
- (1) Stage 1 using Power Clean #399-LR (no VOC or HAPs) heated by a natural gas-fired 3.30 MMBtu/hr heater, identified as WO1.
 - (2) Stage 2 and stage 4 rinse using water.
 - (3) Stage 3 using Toner ABF-35 (no VOC or HAPs).
 - (4) Stage 5 using Bond Sealer BS-1200 (no VOC or HAPs).
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) One (1) natural gas-fired dry off oven, identified as DRO1, approved for construction in 2011, with a maximum heat capacity of 2.5 MMBtu/hr.
 - (2) One (1) natural gas-fired cure oven, identified as CO1, approved for construction in 2011, with a maximum heat capacity of 5.0 MMBtu/hr.
 - (3) Two (2) natural gas-fired air make up units, identified as AMU1 and AMU2, approved for construction in 2011, with a maximum heat capacity of 6.0 MMBtu/hr, each.
 - (4) One (1) natural gas-fired air make up unit, identified as AMU3, approved for construction in 2011, with a maximum heat capacity of 2.0 MMBtu/hr.
 - (5) four (4) natural gas-fired air make up units, identified as AMU4 through AMU6, approved for construction in 2011, with a maximum heat capacity of 1.0 MMBtu/hr, each
 - (3) Two (2) natural gas-fired air make up units, identified as AMU6 and AMU7, approved for construction in 2011, with a maximum heat capacity of 3.2 MMBtu/hr, each

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration 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.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R039-30631-00712 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Registrant shall implement the PMPs.

- (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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

Compliance Requirements [326 IAC 2-1.1-11]

C.3 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--5.5-4(b)]

C.4 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

Corrective Actions and Response Steps

C.5 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

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

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Two (2) Powder Coating Booths, identified as Booth 1 and Booth 2, approved for construction in 2011, with a capacity of 3,750 pounds of aluminum per hour and 100 pounds of coating per hour (3,850 pounds total), each, using integral cartridge dust collectors as control, and exhausting indoors.
- (b) Three (3) aluminum extrusion lines, approved for construction in 2011, using no controls, and consisting of:
 - (1) Extruder Line 1, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH1, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO1, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO1, rated at 2.25 million British thermal units per hour.
 - (2) Extruder Line 2, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH2, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO2, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO2, rated at 2.25 million British thermal units per hour.
 - (3) Extruder Line 3, with a capacity of 2,600 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH3, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO3, rated at 0.30 million British thermal units 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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) powder coating booths shall not exceed 6.36 pounds per hour, when operating at a process weight rate of 3,850 pounds per hour, each.

The pounds per hour limitation was calculated with 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

D.1.2 Preventive Maintenance Plan [326 IAC 2-5.5-4(b)]

A Preventive Maintenance Plan is required for powder coating booths and its control devices. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1 the powder recovery system (cartridge dust collectors) for the two (2) powder coating booths shall be in operation and control emissions at all times the powder coating booths are in operation. The Permittee shall operate the control device in accordance with manufacturer(s) specifications.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Lippert Components, Inc.
Address:	1722 Mishawaka Road
City:	Elkhart, Indiana 46517
Phone Number:	(574) 312-6309
Registration No.:	R039-30631-00712

I hereby certify that Lippert Components, Inc. is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R039-30631-00712.
- not in compliance with the requirements of Registration No. R039-30631-00712.

I hereby certify that Lippert Components, Inc. is:

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name: Lippert Components, Inc.
Source Location: 1722 Mishawaka Road, Elkhart, Indiana 46517
County: Elkhart
SIC Code: 3354 (Aluminum Extruded Products)
Registration No.: R039-30631-00712
Permit Reviewer: Bruce Farrar

On June 14, 2011, the Office of Air Quality (OAQ) received an application from Lippert Components, Inc. related to the construction and operation of a new extruder aluminum parts manufacturing plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lippert Components, Inc. on June 14, 2011, relating to the construction of an extruded aluminum parts manufacturer consisting of one (1) powder coating booth, three (3) aluminum extruding lines and one (1) five stage wash line.

The following is a list of the new emission units and pollution control devices:

- (a) Two (2) Powder Coating Booth, identified as Booth 1 and Booth 2, approved for construction in 2011, capacity of 3,750 pounds of aluminum per hour and 100 pounds of coating per hour (3,850 pounds total), each, using integral cartridge dust collectors as control, and exhausting indoors.
- (b) Three (3) aluminum extrusion lines, approved for construction in 2011, using no controls, and consisting of:
- (1) Extruder Line 1, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH1, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO1, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO1, rated at 2.25 million British thermal units per hour.
 - (2) Extruder Line 2, with a capacity of 2,200 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH2, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO2, rated at 0.30 million British thermal units per hour.
 - (C) One (1) natural gas-fired aging heater, identified as AO2, rated at 2.25 million British thermal units per hour.
 - (3) Extruder Line 3, with a capacity of 2,600 pounds of aluminum per hour with the following:
 - (A) One (1) natural gas-fired process heater, identified as LH3, rated at 5.4 million British thermal units per hour.
 - (B) One (1) natural gas-fired die heater, identified as DO3, rated at 0.30 million British thermal units per hour.

- (c) One (1) five stage parts washer, approved for construction in 2011, with a maximum capacity of 7,500 pounds of aluminum per hour, consisting of:
- (1) Stage 1 using Power Clean #399-LR (no VOC or HAPs) heated by a natural gas-fired 3.30 MMBtu/hr heater, identified as WO1.
 - (2) Stage 2 and stage 4 rinse using water.
 - (3) Stage 3 using Toner ABF-35 (no VOC or HAPs).
 - (4) Stage 5 using Bond Sealer BS-1200 (no VOC or HAPs).
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) One (1) natural gas-fired dry off oven, identified as DRO1, approved for construction in 2011, with a maximum heat capacity of 2.5 MMBtu/hr.
 - (2) One (1) natural gas-fired cure oven, identified as CO1, approved for construction in 2011, with a maximum heat capacity of 5.0 MMBtu/hr.
 - (3) Two (2) natural gas-fired air make up units, identified as AMU1 and AMU2, approved for construction in 2011, with a maximum heat capacity of 6.0 MMBtu/hr, each.
 - (4) One (1) natural gas-fired air make up unit, identified as AMU3, approved for construction in 2011, with a maximum heat capacity of 2.0 MMBtu/hr.
 - (5) four (4) natural gas-fired air make up units, identified as AMU4 through AMU6, approved for construction in 2011, with a maximum heat capacity of 1.0 MMBtu/hr, each
 - (3) Two (2) natural gas-fired air make up units, identified as AMU6 and AMU7, approved for construction in 2011, with a maximum heat capacity of 3.2 MMBtu/hr, each.

“Integral Part of the Process” Determination

The applicant has submitted the following justifications such that the dust collector be considered as an integral part of the powder coat booths process:

- (a) The primary purpose of the equipment is to allow the parts to be coated efficiently without defects. If the filtration system was not operational for any reason, the parts could not be coated without quality defects.
- (b) The system is setup to automatically recover the powder coating. The recovered powder coating is sent directly to the holding tank for reuse, since only one powder coating is used, all the powder coating can be recovered.
- (c) The filtration system is required for this installation. The "system" is hardwired to the control panel power source such that the filtration system must operate when the system is turned on or the powder booth cannot operate. If the filters become clogged or an excessive pressure drop deactivates the filtration system, the powder guns will not operate. This is not an "interlock" that can be by-passed; it is part of the hard wiring of the control system so that the operation cannot operate without the filtration system running.

IDEM, OAQ has evaluated the justifications and agreed that the dust collector will be considered as an integral part of the powder coat booth process. This determination is based on the fact that the dust collectors must be operational for the powder coating booths to operate and the powder coating will be reused. Therefore, the permitting level will be determined using the potential to emit after the dust collector. Particulate from the powder coat booth shall be controlled by the dust collector at all times that the powder coat booths are in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAP	Worst Single HAP
Powder Coating Booths***	0.11	0.11	0.11	-	-	-	-	-	-	-
Aluminum Extrusion Lines****	-	-	-	-	-	-	-	-	-	-
Parts Washer	-	-	-	-	-	-	-	-	-	-
Combustion Units	0.47	1.89	1.89	0.15	24.88	1.37	20.90	30,035	0.47	0.45 (Hexane)
Total PTE of Entire Source	0.58	2.00	2.00	0.15	24.88	1.37	20.90	30,035	<25	<10
Registration Levels	25	25	25	25	25	25	100	100,000	25	10

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

**The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

*** PTE after control because the powder recovery system is considered integral to the process.

**** Emissions from the Extrusion Lines are accounted for in the Combustion Units emissions. There are no process emissions from these lines.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per

year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for National Emission Standards for Halogenated Solvent Cleaning, (40 CFR 63.460, Subpart T) (326 IAC 20-6) are not included in this registration, because the five (5) stage parts washer does not use any halogenated solvents
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included for this registration, because this source is not a major source for HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), are not included for this registration, because for the purposes of this subpart, spray-applied coatings do not include surface coating application using powder coating.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the natural gas-fired boiler, because gas-fired boiler, as define in 40 CFR 63.11237, is specifically exempted from this rule as indicated in 40 CFR 63.11195(e).
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included for this registration, because the facility is not one of the nine source categories listed in 40 CFR 63.11514(a).
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Powder Coating Booth1 and Booth 2

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The powder coating booths, identified as booth 1 booth 2, do not use dip, roll, flow or brush coating and uses more than five (5) gallons of paint per day, therefore, 326 IAC 6-3-2 applies.
- Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder coating booths shall not exceed 6.36 pounds per hour when operating at a process weight rate of 3,850 pounds per hour, each. The pound per hour limitation was calculated with the following equation:
- Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

The powder recovery system (cartridge dust collectors) shall be in operation at all times the powder coating booths are in operation, in order to comply with this limit.

- (i) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The powder coating booths, identified as booth #1 and #2, performs a metal coating process, the source is under the SIC major group 33 and the source was constructed after July 1, 1990. However, the powder coatings do not have any VOC emissions. Therefore, the powder coating booths are not subject to 326 IAC 8-2-9.
- (j) There are no other 326 IAC 8 Rules that are applicable to these units.

Aluminum Extrusion Lines

- (k) 326 IAC 4-2 (Incinerators)
The requirements of 326 IAC 4-2 do not apply to the extrusion lines die ovens or aging ovens, because they do not meet the definition of an incinerator pursuant to 326 IAC 1-2-34.
- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 do not apply extrusion lines, because they do not emit particulate from the process.
- (m) 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)
The requirements of 326 IAC 7-1.1-2 do not apply to this source, because the aluminum extrusion line heaters and ovens do not use coal, residual oil or distillate oil for combustion.
- (n) There are no 326 IAC 8 Rules that are applicable to these units.

Five (5) Stage Wash Line

- (o) 326 IAC 8-3 (Organic Solvent Degreasing Operation)
The requirements of 326 IAC 8-3 do not apply to this source, because the five (5) stage wash line does not use an organic solvent.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 14, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. R039-30631-00712. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Summary**

Company Name: Lippert Components, Inc
Address City IN Zip: 1722 Mishawaka Road, Elkhart, Indiana 46517
Permit Number: R039-30631-00712
Plt ID: 039-00712
Reviewer: Bruce Farrar
Date: June 14, 2011

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	Single HAP
Powder Coating Booths	0.22	0.22	0.22	-	-	-	-	-	-	-
Aluminum Extrusion Lines	-	-	-	-	-	-	-	-	-	-
Parts Washer	-	-	-	-	-	-	-	-	-	-
Combustion Units	0.47	1.89	1.89	0.15	24.88	1.37	20.90	30,036	0.47	0.45
Total:	0.69	2.11	2.11	0.15	24.88	1.37	20.90	30,036	<25	<10

**Appendix A: Emission Calculations
Powder Coating Operation**

Company Name: Lippert Components, Inc
Address: 1722 Mishawaka Road, Elkhart, Indiana 46517
Exemption No.: R039-30631-00712
Plt ID: 039-00712
Reviewer: Bruce Farrar
Date: June 14, 2011

Uncontrolled Potential to Emit

Emission Units (Coating)	Material usage lb/hr	Transfer Efficiency	Control Efficiency*	Hours/year	PM/PM10 Total Uncontrolled PTE (ton/yr)
Booth 1 (White)	100	0.75	99.9%	8760	109.50
Booth 2 (color)	100	0.75	99.9%	8760	109.50

Powder Coating Booths Total: 219.00 tons per year

Controlled Potential to Emit

Emission Units	Material usage lb/hr	Transfer Efficiency	Control Efficiency	Hours/year	PM/PM10 Total Controlled PTE
Booth 1 (White)	100	0.75	99.9%	8760	0.11
Booth 2 (Color)	100	0.75	99.9%	8760	0.11

Powder Coating Booths Total: 0.22 tons per year

*Powder Recovery System considered integral to black powder coating process, therefore uncontrolled PTE is equal to controlled PTE.
 Uncontrolled PTE with powder reclaim system control

Powder coatings used in this operation contain no VOCs or HAPs.
 Calculations based upon 8760 hours/year

Methodology

Coating Total uncontrolled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(1-Controll Efficiency)*(8760)/2000

Total controleld PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(1-Control Efficiency)*(8760)/2000

PM% based upon particle distribution testing performed by manufacturer.
 Control Efficiency of 99.9% for the powder recovery system.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Lippert Components, Inc
Address City IN Zip: 1722 Mishawaka Road, Elkhart, Indiana 46517
Permit Number: R039-30631-00712
Plt ID: 039-00712
Reviewer: Bruce Farrar
Date: June 14, 2011

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Unit Description
16.2			3 Process Heaters (LH1, LH2, LH3) rated at 5.4 MMBtu, each
0.9			3 Die Ovens (DO1, DO2, DO3) rated at 0.30 MMBtu, each
4.5			2 Aging Ovens (AO1, AO2) rated at 2.25 MMBtu, each
3.3			One Process Heater (WO1) rated at 3.3 MMBtu/hr
2.5			One Drying Oven (DRO1) rated at 2.5 MMBtu/hr
5.0			One Curing Oven (CO1) rated at 5.0 MMBtu/hr
12.0			2 Air Make up Units (AMU1, AMU2) rated at 6.0 MMBtu each
2.0			1 Air Make up Unit (AMU3) rated at 2.0 MMBtu
4.0			4 Air Make up Units (AMU4, AMU5, AMU6, AMU7) rated at 1.0 MMBtu each
6.4			2 Air Make up Units (AMU8, AMU9) rated at 3.2 MMBtu each
56.8	1000	497.6	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.47	1.89	0.15	24.88	1.37	20.90

*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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Lippert Components, Inc
Address City IN Zip: 1722 Mishawaka Road, Elkhart, Indiana 46517
Permit Number: R039-30631-00712
Plt ID: 039-00712
Reviewer: Bruce Farrar
Date: June 14, 2011

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	5.224E-04	2.985E-04	1.866E-02	4.478E-01	8.459E-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	1.244E-04	2.737E-04	3.483E-04	9.454E-05	5.224E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See Page 5 for Greenhouse Gas calculations.

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

Company Name: Lippert Components, Inc
Address City IN Zip: 1722 Mishawaka Road, Elkhart, Indiana 46517
Permit Number: R039-30631-00712
Plt ID: 039-00712
Reviewer: Bruce Farrar
Date: June 14, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	29854.08	0.5722032	0.5473248
Summed Potential Emissions in tons/yr	29855.20		
CO2e Total in tons/yr	30035.77		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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TO: Erick Click
Lippert Components, Inc
2766 College Ave
Goshen IN 46517

DATE: August 9, 2011

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Relocation
039-30631-00712

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jim Heim Bruce Carter Associates, Consultant
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 8/9/2011 Lippert Components, Inc. 039-30631-00712 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Erick Click Lippert Components, Inc. 2766 College Ave Goshen IN 46517 (Source CAATS) (CONFIRM DELIVERY)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
6		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
7		Jim Heim Bruce Carter Associates 616 South 4th Street Elkhart IN 46516 (Consultant)									
8		Harman Company 1718 W. Mishawaka Road Elkhart IN 46517 (Affected Party)									
9		Navistar 612 Nelson Parkway Wakarusa IN 46573 (Affected Party)									
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