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: January 19, 2012

RE: Damping Technologies / 141-31119-00580

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from 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-AM.dot12/3/07

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Mr. Adam Parin
Damping Technologies, Inc.
12970 McKinley Highway, Unit IX
Mishawaka, IN 46545

January 19, 2012

Re: Exempt Construction and Operation Status,
141-31119-00580

Dear Mr. Parin:

The application from Damping Technologies, Inc, received on November 4, 2011, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary rubber/viscoelastic formulation and curing process for the use in manufacturing vibration damping panels located at 12970 McKinley Highway, Unit IX, Mishawaka, Indiana is classified as exempt from air pollution permit requirements:

(a) One (1) closed rubber mixing operation, identified as RPM1, constructed in 1997, with a maximum capacity of 26.67 pounds of rubber per hour, and exhausting to the indoors.

(b) One (1) closed viscoelastic filler mixing operation, identified as AB1, constructed in 1997, with a maximum capacity of 21.36 pounds of powdered filler and solvent per hour (170.86 pounds per eight (8) hour batch), and exhausting to the indoors.

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) natural gas-fired space heater, identified as RSH1, with a maximum heat input capacity of 0.132 MMBtu/hr, and exhausting to the outdoors.

(2) One (1) natural gas-fired space heater, identified as OASH1, with a maximum heat input capacity of 0.125 MMBtu/hr, and exhausting to the outdoors.

(3) One (1) natural gas-fired space heater, identified as BTLSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(4) One (1) natural gas-fired space heater, identified as MTSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(5) One (1) natural gas-fired space heater, identified as EDSH1, with a maximum heat input capacity of 0.125 MMBtu/hr, and exhausting to the outdoors.

(6) One (1) natural gas-fired space heater, identified as GBSH1, with a maximum heat input capacity of 0.225 MMBtu/hr, and exhausting to the outdoors.

(7) One (1) natural gas-fired space heater, identified as GBSH2, with a maximum heat input capacity of 0.225 MMBtu/hr, and exhausting to the outdoors.

(8) One (1) natural gas-fired space heater, identified as ALSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(9) One (1) natural gas-fired space heater, identified as HBSH1, with a maximum heat input capacity of 0.13 MMBtu/hr, and exhausting to the outdoors.

(10) One (1) natural gas-fired space heater, identified as HBSH2, with a maximum heat input capacity of 0.13 MMBtu/hr, and exhausting to the outdoors.

(d) Paved roads and parking lots with public access.

The following conditions shall be applicable:

(a) 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 thirty percent (30%) 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.

(b) 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.

This exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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.idem.in.gov

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. If you have any questions on this matter, please contact Brian Williams, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5375 or at 1-800-451-6027 (ext 45375).

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/BMW

cc: File - St. Joseph County
St. Joseph County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Description and Location

Source Name:	**Damping Technologies, Inc.**
Source Location:	**12970 McKinley Highway, Unit IX, Mishawaka, IN 46545**
County:	**St. Joseph**
SIC Code:	**3799 (Transportation Equipment, Not Elsewhere Classified)**
Exemption No.:	**141-31119-00580**
Permit Reviewer:	**Brian Williams**

On November 4, 2011, the Office of Air Quality (OAQ) received an application from Damping Technologies, Inc. related to the operation of an existing rubber/viscoelastic formulation and curing process for the use in manufacturing vibration damping panels.

Source Definition

Damping Technologies, Inc. makes vibration damping products, primarily panel inserts used in aircraft and ground transportation equipment. The company has three locations in Mishawaka.

(1) Plant 1 is located at 12970 McKinley Highway, Unit IX, Mishawaka, Indiana, Plant ID: 141-00580;

(2) Plant 2 is located at 1810 East 12th Street, Mishawaka, Indiana, Plant ID: 141-00581; and

(3) Plant 3 is located at 55656 Currant Road, Mishawaka, Indiana, Plant ID: 141-00582.

The McKinley Road plant (Plant ID 141-00580) produces a proprietary viscoelastic and houses the corporation's main offices. The 12th Street plant (Plant ID 141-00581) blends polymeric resins to create polymeric panels. The Currant Road plant (Plant ID 141-00582) performs polymeric blending, panel manufacturing and final cutting, packaging and shipping. Damping Technologies also uses three off-site companies that assist in the production process. Due to confidentiality concerns, these companies will be referred to as the Alpha, Beta and Gamma plants. IDEM, OAQ has examined whether these six plants are part of the same source. The term "source" is defined at 326 IAC 1-2-73. In order for two or more plants to be considered one source, they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

(3) the plants must be located on contiguous or adjacent properties.

The three Mishawaka facilities; the McKinley Road plant, the 12th Street plant and the Currant Road plant are all leased by Damping Technologies, Inc. Since the plants are under common ownership they are also under common control and meet the first element of the source definition. The Alpha, Beta and Gamma plants are not owned by Damping Technologies, Inc., do not have any common owner and do not have any directors, corporate officers in common with Damping Technologies, Inc.

IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source" in 326 IAC 2-7-1(22). However, since the major source definition is in all respects identical to the source definition, the nonrule policy is of use in guiding this source determination. IDEM's Nonrule Policy Document Air-005 sets out two independent tests to determine if common control exists when there is no common ownership.
The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- is a majority of the output of the auxiliary activity provided to the primary activity?
- can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?
- can the primary activity assume control of the auxiliary activity under certain circumstances?
- is the auxiliary activity required to submit periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The McKinley Road plant sends all its viscoelastic blend offsite to either the Alpha or Beta plant for further processing. The Alpha and Beta plants do less than 10 percent of their total work for the McKinley Road plant. The Alpha and Beta plants returned the processed viscoelastic to the McKinley Road plant where it is further processed. The processing provided by the Alpha and Beta plants directly serves the purpose of the McKinley Road plant. The Alpha and Beta plants do not do a majority of their work for the McKinley plant, since less than 10 percent of their work is done for the McKinley Road plant. All three plants are free to enter into contracts with any other company. None of the plants has the power to assume control of any other plant under any circumstances. None of the plants is required to submit any reports to the others. IDEM finds that none of the plants have a major role in the day to day operation of the other plants. Therefore the Alpha and Beta plants are not under common control with the McKinley plant. Since there is not common ownership or common control for the Alpha and Beta plants, they do not meet the first element of the source definition.

After receiving the processed viscoelastic from the Alpha and Beta plants, the McKinley Road plant further processes the viscoelastic. It sends the entire fully processed viscoelastic to the Gamma plant. The 12th Street plant and the Currant Road plant send all the panels they produce directly to the Gamma plant. The Gamma plant uses the viscoelastic from the McKinley Road plant and panels from the 12th Street and Current Road plants to produce damping sheets. The Gamma plant does most of its work for Damping Technologies, Inc. The Gamma plant sends all the damping sheets it produces to the Currant Road plant where they are processed and shipped out to customers.

The Gamma plant does a majority of its work for the Damping Technologies, Inc. All of the initial output of the three Damping Technologies plants is sent to the Gamma plant. All three plants are free to enter into contracts with any other company. None of the plants has the power to assume control of any other plant under any circumstances. None of the plants is required to submit any reports to the others. IDEM finds that Damping Technologies plants do have a major role in the day to day operation of the Gamma plant. Therefore the Gamma plant is under common control with the three Damping Technologies plants.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. The Alpha and Beta plants do not do a majority of their work for the McKinley Road plant. If the McKinley Road plant were to stop sending viscoelastic to the Alpha and Beta plants for processing, the Alpha and Beta plants would still have more than 90% of their work and could continue operating. Therefore the second control test is not

met for the Alpha and Beta plants.

The three Damping Technologies plants supply 100% of their output to the Gamma plant. If the Damping plants were to shut down, the Gamma plant would lose more than 60% of its current customers, greatly affecting its ability to continue operating. Therefore the second common control test is met for the Gamma plant. IDEM finds that the first element of the source definition is satisfied for the three Damping Technologies plants and the Gamma plant but not for the Alpha and Beta plants.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The three Damping Technologies plants and the Gamma plant have the same two-digit SIC Code. 37 for the Major Group Transportation Equipment. The Alpha and Beta plants have the two-digit SIC Code 28 for the Major Group Chemical and Allied Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The McKinley plant sends 100% of its output to the Alpha and Beta plants to be processed. All of the output is returned to it and after final processing it sends 100% of its output to the Gamma plant. Therefore, the McKinley plant is a support facility to the Alpha, Beta and Gamma plants. The 12th Street plant and Currant Road plants also send 100% of their output to the Gamma Plant. The Gamma Plant sends 100% of its output to the Currant Road plant. Therefore the 12th Street plant and the Currant Road plant are support facilities to the Gamma plant and the Gamma plant is a support facility to the Currant Road plant. All three Damping Technologies plants and the Gamma plant meet the second part of the source definition, since they have the same two-digit SIC Code and have support relationships. The Alpha plant and the Beta plant meet the second part of the source definition only with the McKinley Road plant, since they have a support relationship with only the McKinley Road plant.

None of the plants is on the same piece of property. The McKinley Road plant is about half a mile from the Currant Road plant. The McKinley road plant and Currant road plant are both about 3 miles from the 12th street plant. The Alpha and Beta plants are both over 9 miles from the three Damping Technologies plants. The Gamma plant is over 100 miles from the three Damping Technologies plants. There are other properties separating all six of the plants. Since none of the plants are on contiguous properties, IDEM examined whether the plants are on adjacent properties.

The term “adjacent” is not defined in Indiana’s air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality and a U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, that discuss the term “adjacent”. These letters are in no way binding on IDEM, OAQ, but they are persuasive in that they illustrate a longstanding analysis used to determine if two sources are “adjacent”; going as far back as the preamble to the 1980 NSR program definition of a source. U.S. EPA’s consistent approach is that any evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”. The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

(1) Are materials routinely transferred between the plants?
(2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
(3) Is the production process itself split in any way between the plants?

The McKinley Road plant has separate managers and separate production staff from the Alpha and Beta plants. The production process is split between the plants. The entire viscoelastic produced at the McKinley Road plant is sent to the Alpha plant and then to the Beta plant for further processing before it is returned to the McKinley Road plant. However, the distance between the plants, over nine miles, does not enable them to operate in this manner. The plants have no physical connections. The Alpha and Beta plants could be a great deal further apart without any affect on their operations. The Alpha and Beta and McKinley Road plants are not adjacent and do not meet the third part of the source definition.

The Gamma plant has separate managers and separate production staff from the three Damping Technologies plants. The production process is split between the plants, since the viscoelastic and panels produced at the Damping Technologies plants are sent to the Gamma plant that makes the damping panels. These panels are then sent to the Currant Road plant. The distance between the Gamma plant and the three Damping Technologies plants, over 100 miles, does not enable them to operate in this manner. The plants have no physical connections. The Gamma plant could be even further away from the three Damping Technologies plants without any effect on the production process. The Gamma plant is not adjacent to the three Damping Technologies plants and does not meet the third part of the definition of source.

The three Damping Technologies plants have separate managers and separate production staff. While the production process itself is split between the plants, there is no material that is transferred between the three plants. All the material the three plants produce is sent to the Gamma plant. The distance between the three Damping Technologies plants does not enable them to operate as one source, since no final product can be produced without the damping sheet production at the Gamma plant, which is over 100 miles away. The Damping Technologies plants could be located far away from each other and it would not affect their individual production or the ability or expense of the plants to ship their intermediate products to the Gamma plant. Therefore the three Damping Technologies plants are not adjacent and do not meet the third part of the source definition.

Since none of the six plants meets all three parts of the source definition, IDEM, OAQ has determined that the Alpha plant, the Beta plant, the Gamma plant, the McKinley Road plant, the 12th Street plant and the Currant Road plant are all separate sources and that none of them are part of the same source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in St. Joseph 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 St. Joseph County, and is a maintenance area for the 1-hour ozone 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 PM2.5.

(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. St. Joseph 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) $PM_{2.5}$
St. Joseph 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. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 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.

(c) Other Criteria Pollutants
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other criteria 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, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Damping Technologies, Inc. on November 4, 2011, relating to the operation of an existing rubber/viscoelastic formulation and curing process for the use in manufacturing vibration damping panels. On or about August 25, 2011, IDEM inspected the three Mishawaka manufacturing facilities that are owned and operated by Damping Technologies, Inc. Due to this inspection, IDEM requested that Damping Technologies, Inc. submit an application for the purpose of determining the air permit compliance status of the company. IDEM has determined that the three facilities are separate. Therefore, based on the unlimited potential to emit this facility will be issued an Exemption.

The source consists of the following existing emission units:

(a) One (1) closed rubber mixing operation, identified as RPM1, constructed in 1997, with a maximum capacity of 26.67 pounds of rubber per hour, and exhausting to the indoors.

(b) One (1) closed viscoelastic filler mixing operation, identified as AB1, constructed in 1997, with a maximum capacity of 21.36 pounds of powdered filler and solvent per hour (170.86 pounds per eight (8) hour batch), and exhausting to the indoors.

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) natural gas-fired space heater, identified as RSH1, with a maximum heat input capacity of 0.132 MMBtu/hr, and exhausting to the outdoors.

(2) One (1) natural gas-fired space heater, identified as OASH1, with a maximum heat input capacity of 0.125 MMBtu/hr, and exhausting to the outdoors.

(3) One (1) natural gas-fired space heater, identified as BTLSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(4) One (1) natural gas-fired space heater, identified as MTSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(5) One (1) natural gas-fired space heater, identified as EDSH1, with a maximum heat input

capacity of 0.125 MMBtu/hr, and exhausting to the outdoors.

(6) One (1) natural gas-fired space heater, identified as GBSH1, with a maximum heat input capacity of 0.225 MMBtu/hr, and exhausting to the outdoors.

(7) One (1) natural gas-fired space heater, identified as GBSH2, with a maximum heat input capacity of 0.225 MMBtu/hr, and exhausting to the outdoors.

(8) One (1) natural gas-fired space heater, identified as ALSH1, with a maximum heat input capacity of 0.15 MMBtu/hr, and exhausting to the outdoors.

(9) One (1) natural gas-fired space heater, identified as HBSH1, with a maximum heat input capacity of 0.13 MMBtu/hr, and exhausting to the outdoors.

(10) One (1) natural gas-fired space heater, identified as HBSH2, with a maximum heat input capacity of 0.13 MMBtu/hr, and exhausting to the outdoors.

(d) Paved roads and parking lots with public access.

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 – Exemption

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	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Rubber Mixing Operations (RPM1)	0.09	0.09	0.09	0	0	0.001	0	0	0.001	0.0002 Carbonyl Sulfide
Viscoelastic Filler Mixing Operations (AB1)	0.47	0.47	0.47	0	0	0.70	0	0	0.70	0.70 Toluene
Natural Gas Combustion	0.02	0.06	0.06	0.005	0.83	0.05	0.69	996.6	0.02	0.015 Hexane
Paved Roads	0.04	0.01	0.002	0	0	0	0	0	0	0
Total PTE of Entire Source	**0.62**	**0.63**	**0.62**	**0.005**	**0.83**	**0.75**	**0.69**	**996.6**	**0.72**	**0.70 Toluene**
Exemptions Levels**	5	5	5	10	10	10	25	100,000	25	10

*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 CO_2e 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.

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) 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 CO_2 equivalent emissions (CO_2e) 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) The requirements of the New Source Performance Standard for Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB (326 IAC 12), are not included in the permit, since this source does not manufacture rubber tires.

(b) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, 40 CFR 60, Subpart DDD (326 IAC 12), are not included in the permit, since this source does not manufacture polymers. This source heat blends purchased natural and synthetic polymers to create a solid viscoelastic base polymer blend.

(c) 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)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX (326 IAC 20-55), are not included in the permit, since this source does not manufacture rubber tires and is not a major source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Paints and Allied Products Manufacturing (40 CFR 63, Subpart CCCCCCC) are not included in the permit, since this source does not process, use, or generate materials containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), or 1.0 percent by weight for non-carcinogens.

(c) 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)

(a) 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 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption 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 thirty percent (30%) 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)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. 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 6.5-1-2 (Particulate Matter Limitations Except Lake County)
This stationary source is located in St. Joseph County. This source is not specifically listed in 326 IAC 6.5-2 and has an unlimited potential to emit less than one hundred (100) tons of particulate matter per year and actual emissions less than ten (10) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 6.5-1-2.

(h) 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.

(i) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
This source heat blends purchased natural and synthetic polymers to create a solid viscoelastic base polymer blend. Therefore, the requirements of 326 IAC 8-5-4 are not applicable since this source does not manufacture pneumatic rubber tires.

(j) 326 IAC 8-14 (Architectural and Industrial Maintenance (AIM) Coatings)
This source does not supply, sell, offer for sale, or manufacture any AIM coatings as defined in 326 IAC 8-14-2. Therefore, the requirements of 326 IAC 8-14 are not applicable to this source.

(k) 326 IAC 8-22 (Miscellaneous Industrial Adhesives)
This source is not located in Lake or Porter Counties and does not have a miscellaneous industrial adhesive application process. Therefore, the requirements of 326 IAC 8-22 are not applicable to this source.

Rubber Mixing Operation

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the rubber mixing operation is not subject to the requirements of 326 IAC 6-3-2 because the potential particulate matter emissions are less than 0.551 pounds per hour.

(b) There are no 326 IAC 8 Rules applicable to the rubber mixing operation.

Viscoelastic Filler Mixing Operation

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the viscoelastic filler mixing operation is not subject to the requirements of 326 IAC 6-3-2 because the potential particulate matter emissions are less than 0.551 pounds per hour.

(b) There are no 326 IAC 8 Rules applicable to the viscoelastic filler mixing operation.

Natural Gas Combustion

(a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

(b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(d) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The natural gas-fired combustion units are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty-five (25) tons per year.

(e) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

(f) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

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 November 4, 2011.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 141-31119-00580. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brian Williams 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) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.

(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
Particulate, VOC, and HAP Emissions From
Rubber Mixing Operations

Company Name: **Damping Technologies, Inc.**
Address City IN Zip: **12970 McKinley Highway, Mishawaka, Unit IX, IN 46545**
Permit Number: **141-31119-00580**
Reviewer: **Brian Williams**

Pollutant	Maximum Rubber Input Capacity (lb/hr)	Maximum Rubber Input Capacity (lb/yr)	Mixing Emission Factor (lb/lb rubber)	Potential Emissions (lb/hr)	Potential Emissions (tons/yr)
PM/PM10/PM2.5	26.67	233,629.20	7.84E-04	0.0209	0.09
VOC	26.67	233,629.20	7.52E-06	0.0002	0.001
Total HAPs	26.67	233,629.20	6.67E-06	0.0002	0.001
Single Largest HAP (Carbonyl Sulfide)	26.67	233,629.20	1.58E-06	0.00004	0.0002

Methodology
Potential Emissions (lb/hr) = Maximum Rubber Input Capacity (lb/hr) x Emission Factor (lb/lb rubber)
Potential Emissions (tons/yr) = Maximum Rubber Input Capacity (lb/hr) x Emission Factor (lb/lb rubber) x 8,760 (hrs/year) x 1 (ton)/2,000(lbs)
Source blends solid natural and synthetic polymers to produce acrylate rubber.
Emission Factor Source: AP-42, Section 4.12 (Manufacture of Rubber), Table 4.12-4, Table 4.12-5, Table 4.12-6, Compound #20 (Acrylate Rubber).
PM10 and PM2.5 presumed to equal total PM

Appendix A: Emissions Calculations
Particulate, VOC, and HAP Emissions From
Viscoelastic Filler Mixing Operations

Company Name: **Damping Technologies, Inc.**
Address City IN Zip: **12970 McKinley Highway, Mishawaka, Unit IX, IN 46545**
Permit Number: **141-31119-00580**
Reviewer: **Brian Williams**

Material	Size of Disperser (lbs per Batch)	Hours Per Batch	Maximum Usage Rate (lbs/yr)	Maximum Usage Rate (tons/yr)	VOC Emissions Factor (lbs/ton of VOC)	Percent VOC	PTE of VOC (tons/yr)	HAP Emissons Factor (% of VOC Emissions)	PTE of HAP (tons/yr)	Weight Percent of Coating Pigment (Solids)	PM/PM10/PM2.5 Emissions Factor (lbs/ton)	PTE of PM/PM10/PM2.5 (tons/yr)
Toluene	85.43	8.0	93,546	46.8	30	100.0%	0.70	100.0%	0.70	0%	20	0.00
Powdered Fire Retardant	85.43	8.0	93,546	46.8	30	0.0%	0.00	0.0%	0.00	100%	20	0.47
Potential Emissions (tons/yr)							**0.70**		**0.70**			**0.47**

METHODOLOGY
Emissions factors are from AP-42 Chapter 6.4 Paint and Varnish Table 6.4-1 (May 1983)
IDEM has reviewed this operation and determined that the emission factors in AP-42 Chapter 6.4 are representative of the potential emissions from this operation.
Size of Disperser = lbs of material utilized during one - eight hour shift
Maximum Usage Rate (lbs/year)= (8,760 hours/year divided by 8 hours per batch) * Size of Disperser
Maximum Usage Rate (tons/year) = Maximum Usage Rate (lbs/year)/2000 lbs/ton
PTE of VOC (tons/year) = Maximum Usage Rate (tons/year) * %VOC * VOC emissions Factor (lbs/ton)/2,000 lbs/ton
PTE of HAP (tons/year) = HAP Emissions Factor * PTE of VOC (tons/year)
PTE PM/PM10/PM2.5 (tons/year) = Maximum Usage Rate (tons/year) * Weight Percent of Coating Pigment * PM/PM10/PM2.5 Emissions Factor (lbs/ton)/2,000 lbs/ton

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

Company Name: **Damping Technologies, Inc.**
Address City IN Zip: **12970 McKinley Highway, Mishawaka, Unit IX, IN 46545**
Permit Number: **141-31119-00580**
Reviewer: **Brian Williams**

Unit Description	Unit ID	MMBtu/Hr	Unit Description	Unit ID	MMBtu/Hr
Reception Space Heater	RSH1	0.1320	General Building Space Heater	GBSH1	0.2250
Office Area Space Heater		0.4677	General Building Space Heater	GBSH2	0.2250
Beam Test Lab Space Heater	BTLSH1	0.1500	Acoustic Lab Space Heater	ALSH1	0.1500
MTS Lab Heater	MTSH1	0.1500	High Bay Space Heater	HBSH1	0.1300
Engineering Dept Space Heater	EDSH1	0.1250	High Bay Space Heater	HBSH2	0.1300

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.88	16.5

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.06	0.06	0.00	0.83	0.05	0.69

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

	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	1.734E-05	9.906E-06	6.191E-04	1.486E-02	2.807E-05

	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	4.128E-06	9.081E-06	1.156E-05	3.137E-06	1.734E-05

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	991	1.90E-02	1.82E-02
Summed Potential Emissions in tons/yr	990.7		
CO2e Total in tons/yr	996.6		

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
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).

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: **Damping Technologies, Inc.**
Address City IN Zip: **12970 McKinley Highway, Mishawaka, Unit IX, IN 46545**
Permit Number: **141-31119-00580**
Reviewer: **Brian Williams**

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Parcel Delivery Truck (Entry)	1.0	2.0	2.0	11.8	23.6	300	0.057	0.1	41.5
Parcel Delivery Truck (Leaving)	1.0	2.0	2.0	11.8	23.6	300	0.057	0.1	41.5
		Totals	**4.0**		**47.2**			**0.2**	**83.0**

Average Vehicle Weight Per Trip = 11.8 tons/trip
Average Miles Per Trip = 0.06 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	11.8	11.8	11.8	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.078	0.216	0.0529	lb/mile
Mitigated Emission Factor, Eext =	0.986	0.197	0.0484	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.02	0.004	0.001	0.02	0.004	0.001
Vehicle (leaving plant) (one-way trip)	0.02	0.004	0.001	0.02	0.004	0.001
Totals	**0.04**	**0.01**	**0.002**	**0.04**	**0.01**	**0.002**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emissions Calculations
Summary of Emissions

Company Name: Damping Technologies, Inc.
Address City IN Zip: 12970 McKinley Highway, Mishawaka, Unit IX, IN 46545
Permit Number: 141-31119-00580
Reviewer: Brian Williams

Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single HAP	
Rubber Mixing Operations	0.09	0.09	0.09	0	0	0.001	0	0	0.001	0.0002	Carbonyl Sulfide
Viscoelastic Filler Mixing Operations	0.47	0.47	0.47	0	0	0.70	0	0	0.70	0.70	Toluene
Natural Gas Combustion	0.02	0.06	0.06	0.005	0.83	0.05	0.69	996.6	0.02	0.015	Hexane
Paved Roads	0.04	0.01	0.002	0	0	0	0	0	0	0	
Total	**0.62**	**0.63**	**0.62**	**0.005**	**0.83**	**0.75**	**0.69**	**996.6**	**0.72**	**0.70**	**Toluene**

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
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Adam Parin
Damping Technologies, Inc.
12970 McKinley Highway, Unit IX
Mishawaka, IN 46545

DATE: January 19, 2012

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

SUBJECT: Final Decision
Exemption
141-31119-00580

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:
OAQ Permits Branch Interested Parties List
Kevin Parks, D & B Environmental Services, Consultant

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.

Mail Code 61-53

IDEM Staff	DPABST 1/23/2012 Damping Technologies, Inc 141-31119-00580 (Final)		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Adam Parin Damping Technologies, Inc 12970 McKinley Highway, Unit IX Mishawaka IN 46545 (Source CAATS) (CONFIRM DELIVERY)									
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
3		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
4		Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 *(Local Official)*									
5		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
6		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 *(Affected Party)*									
7		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 *(Local Official)*									
8		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 *(Health Department)*									
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
10											
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