



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
*Governor*

Bruno L. Pigott  
*Commissioner*

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Part 70 Operating Permit

for Lippert Components, Inc. Plant 59 in Elkhart County

Part 70 Operating Permit Renewal No.: T039-39008-00185

The Indiana Department of Environmental Management (IDEM) has received an application from Lippert Components, Inc. Plant 59 located at 701 Collins Road, Elkhart, Indiana 46516 for a renewal of its Part 70 Operating Permit issued on December 12, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Lippert Components, Inc. Plant 59 to continue to operate its existing source.

This draft Part 70 Operating Permit Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

Elkhart Public Library  
300 S 2nd St.  
Elkhart, IN 46516

and

IDEM Northern Regional Office  
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450  
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing,

you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T039-39008-00185 in all correspondence.

**Comments should be sent to:**

Brian Wright  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Brian Wright or (317) 234-6544  
Or dial directly: (317) 234-6544  
Fax: (317) 232-6749 attn: Brian Wright  
E-mail: Bwright1@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Wright of my staff at the above address.



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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

DRAFT

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Lippert Components, Inc. Plant 59  
701 Collins Road  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-39008-00185	
Master Agency ID No.: 32676	
Issued by:	Issuance Date:
Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]	
A.4	Nonspecifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>6</b>
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.17	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]	
B.19	Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.20	Source Modification Requirement [326 IAC 2-7-10.5]	
B.21	Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>17</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)] .....</b>	<b>17</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)].....</b>	<b>19</b>
C.7	Performance Testing [326 IAC 3-6]	

<b>Compliance Requirements [326 IAC 2-1.1-11]</b> .....	<b>19</b>
C.8 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>19</b>
C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	
C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
<b>Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]</b> .....	<b>20</b>
C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]	
C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]	
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>21</b>
C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]	
C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]	
C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]	
<b>Stratospheric Ozone Protection</b> .....	<b>23</b>
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>24</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b> .....	<b>24</b>
D.1.1 PSD Minor Limit [326 IAC 2-2]	
D.1.2 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))	
D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]	
D.1.4 Particulate [326 IAC 6-3-2(d)]	
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
<b>Compliance Determination Requirements [326 IAC 2-7-5(1)]</b> .....	<b>26</b>
D.1.6 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]	
D.1.7 Particulate Matter	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]</b> .....	<b>26</b>
D.1.8 Monitoring [40 CFR 64]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>26</b>
D.1.9 Record Keeping Requirements	
D.1.10 Reporting Requirements	
<b>SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>28</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b> .....	<b>28</b>
D.2.1 Particulate [326 IAC 6-2-3]	
D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
<b>CERTIFICATION</b> .....	<b>29</b>
<b>EMERGENCY OCCURRENCE REPORT</b> .....	<b>30</b>
<b>Part 70 Quarterly Report</b> .....	<b>32</b>
<b>Part 70 Quarterly Report</b> .....	<b>33</b>
<b>Part 70 Quarterly Report</b> .....	<b>34</b>
<b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT</b> .....	<b>35</b>

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

---

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

Source Address:	701 Collins Road, Elkhart, Indiana 46516
General Source Phone Number:	574-312-6440
SIC Code:	3711 (Motor Vehicles and Passenger Car Bodies)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

---

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

- (a) One (1) surface coating line, identified as Frame Coating, constructed after 1990 and prior to 1997, equipped with three (3) air-assisted airless spray guns and dry filters for overspray control, exhausting to Stacks E1 and E2, capacity: six (6) metal recreational vehicle frames per hour.
- (b) One (1) paint booth, identified as PB2, constructed in 2008, equipped with airless and air-assisted airless spray equipment, has maximum production capacity of 2.5 chassis per hour, uses dry filters as control, and exhausts to four (4) stacks identified as PB2-A, PB2-B, PB2-C, and PB2-D.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
  - (1) One (1) natural gas-fired boiler, identified as B-1, constructed around 1974, exhausting to Stack BO-1, with a maximum heat input capacity of 0.901 MMBtu/hr.
  - (2) One (1) office water heater with a maximum heat input capacity of 0.032 MMBtu/hr.

A.4 Nonspecifically Regulated Insignificant Activities  
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

---

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Welding and Cutting operations consisting of the following:
  - (1) Two (2) submerged arc welding stations, with a maximum wire consumption rate of 1 pound per hour, each.
  - (2) Sixty (60) metal inert gas welding stations for steel welding, with a maximum wire consumption rate of 12 pounds per hour.
  - (3) Four (4) oxyacetylene cutting operation with a maximum metal cutting rate of 24 inches per minute for one (1) inch thick metal.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
  - (1) One (1) air make-up unit, identified as MAU-1, with a maximum heat input capacity of 2.15 MMBtu/hr.
  - (2) One (1) air make-up unit, identified as MAU-2, with a maximum heat input capacity of 4.0 MMBtu/hr.
  - (4) Six (6) radiant tube heaters with a maximum heat input capacity of 0.20 MMBtu/hr each.
  - (5) Three (3) radiant tube heaters with a maximum heat input capacity of 0.15 MMBtu/hr each.
  - (6) Five (5) radiant tube heaters with a maximum heat input capacity of 0.08 MMBtu/hr each.
  - (7) One (1) office space heater with a maximum heat input capacity of 0.06 MMBtu/hr.
  - (8) One (1) office space heater with a maximum heat input capacity of 0.075 MMBtu/hr.
  - (9) One (1) office space heater with a maximum heat input capacity of 0.12 MMBtu/hr.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T039-39008-00185, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:



- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]**

---

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

**B.11 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

---

- (a) All terms and conditions of permits established prior to T039-39008-00185 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

---

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.18 Permit Revision Under Economic Incentives and Other Programs  
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

---

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.



- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

---

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

---

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

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

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

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.7 Performance Testing [326 IAC 3-6]

---

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

---

- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]**

---

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);  
or

- (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

---

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

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

Indiana Department of Environmental Management



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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) surface coating line, identified as Frame Coating, constructed after 1990 and prior to 1997, equipped with three (3) air-assisted airless spray guns and dry filters for overspray control, exhausting to Stacks E1 and E2, capacity: six (6) metal recreational vehicle frames per hour.
- (b) One (1) paint booth, identified as PB2, constructed in 2008, equipped with airless and air-assisted airless spray equipment, has maximum production capacity of 2.5 chassis per hour, uses dry filters as control, and exhausts to four (4) stacks identified as PB2-A, PB2-B, PB2-C, and PB2-D.

(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 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

- (a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following units shall be less than the limits specified in the table below:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Surface Coating Line	Frame Coating	18.46	18.46	18.46
Spray Paint Booth	PB2	5.00	5.00	5.00

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide PM, PM10, and PM2.5 emissions to less than 250 tons per year, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the two (2) surface coating operations (Frame Coating and PB2) shall not exceed 249.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.2 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

In order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart M) not applicable, the Permittee shall comply with the following:

- (a) The total input of any single HAP, including coating, dilution solvents, and cleaning solvents to the surface coating operations (Frame Coating and PB2) shall not exceed

9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Frame Coating and PB2) shall not exceed 23.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart M) not applicable.

#### D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

The Permittee shall comply with the following for Frame Coating and PB2:

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating for air dried or forced warm air dried excluding water, as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from Frame Coating and PB2 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### **Compliance Determination Requirements [326 IAC 2-7-5(1)]**

#### **D.1.6 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC and HAP limitations contained in Conditions D.1.1(b), D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.1.7 Particulate Matter**

The dry filters for particulate control on Frame Coating and PB2 shall be in operation at all times that the Frame Coating and PB2 are in operation in order to comply with Conditions D.1.1(a) and D.1.4.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **D.1.8 Monitoring [40 CFR 64]**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters associated with Frame Coating and PB2. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks E1, E2, PB2-A, PB2-B, PB2-C, and PB2-D while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring requirements will satisfy the Compliance Assurance Monitoring (CAM) requirements of 40 CFR 64 for the Frame Coating operation.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.9 Record Keeping Requirements**

- (a) To document the compliance status with Condition D.1.1(b), D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input and content limits and the HAP input limits established in Conditions D.1.1(b), D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The clean-up solvent usage for each month; and
- (4) The total VOC input each month and each compliance period.
- (5) The highest single HAP input each month and each compliance period.
- (6) The total combined HAP input each month and each compliance period.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition

#### D.1.10 Reporting Requirements

---

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(b) and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Specifically Regulated Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
  - (1) One (1) natural gas-fired boiler, identified as B-1, constructed around 1974, exhausting to Stack BO-1, with a maximum heat input capacity of 0.901 MMBtu/hr.
  - (2) One (1) office water heater with a maximum heat input capacity of 0.032 MMBtu/hr.

(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 2-7-5(1)]

#### D.2.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 6-2-3 (Particulate Limitations for Sources of Indirect Heating), the PM emissions from the boiler (B-1) and office water heater shall not exceed 0.60 pounds per MMBtu heat input.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|---|

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

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



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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185  
Facility: Frame Coating and PB2  
Parameter: VOC Input  
Limit: The total input of VOC, including coatings, dilution solvents, and cleaning solvents to Frame Coating and PB2 shall be less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : \_\_\_\_\_ YEAR: \_\_\_\_\_

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

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185  
Facility: Frame Coating and PB2  
Parameter: Highest Single HAP  
Limit: The input of any single HAP to paint booth PB2 shall be less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : \_\_\_\_\_ YEAR: \_\_\_\_\_

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

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185  
Facility: Frame Coating and PB2  
Parameter: Total HAP  
Limit: The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Frame Coating and PB2) shall not exceed 23.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : \_\_\_\_\_ YEAR: \_\_\_\_\_

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

☐ No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lippert Components, Inc. Plant 59  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-39008-00185

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Indiana Department of Environmental Management**  
Office of Air Quality

**Technical Support Document (TSD) for a Part 70 Operating Permit  
Renewal**

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Lippert Components, Inc. Plant 59</b>
<b>Source Location:</b>	<b>701 Collins Road, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3711 (Motor Vehicles and Passenger Car Bodies)</b>
<b>Permit Renewal No.:</b>	<b>T039-39008-00185</b>
<b>Permit Reviewer:</b>	<b>Dominic Williams/Brian Wright</b>

On August 31, 2017, Lippert Components, Inc. Plant 59 submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Lippert Components, Inc. Plant 59 relating to the operation of a stationary RV and mobile home chassis manufacturing plant. Lippert Components, Inc. Plant 59 was issued its third Part 70 Operating Permit Renewal (T039-39008-00185) on December 12, 2013.

<b>Permitted Emission Units and Pollution Control Equipment</b>
---

The source consists of the following permitted emission units:

- (a) One (1) surface coating line, identified as Frame Coating, constructed after 1990 and prior to 1997, equipped with three (3) air-assisted airless spray guns and dry filters for overspray control, exhausting to Stacks E1 and E2, capacity: six (6) metal recreational vehicle frames per hour.
- (b) One (1) paint booth, identified as PB2, constructed in 2008, equipped with airless and air-assisted airless spray equipment, has maximum production capacity of 2.5 chassis per hour, uses dry filters as control, and exhausts to four (4) stacks identified as PB2-A, PB2-B, PB2-C, and PB2-D.

<b>Specifically Regulated Insignificant Activities</b>
--

The source consists of the following specifically regulated insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
  - (1) One (1) natural gas-fired boiler, identified as B-1, constructed around 1974, exhausting to Stack BO-1, with a maximum heat input capacity of 0.901 MMBtu/hr.
  - (2) One (1) office water heater with a maximum heat input capacity of 0.032 MMBtu/hr.

<b>Nonspecifically Regulated Insignificant Activities</b>
---

The source consists of the following nonspecifically regulated insignificant activities:

- (a) Welding and Cutting operations consisting of the following:
  - (1) Two (2) submerged arc welding stations, with a maximum wire consumption rate of 1 pound per hour, each.

- (2) Sixty (60) metal inert gas welding stations for steel welding, with a maximum wire consumption rate of 12 pounds per hour.
- (3) Four (4) oxyacetylene cutting operation with a maximum metal cutting rate of 24 inches per minute for one (1) inch thick metal.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
  - (1) One (1) air make-up unit, identified as MAU-1, with a maximum heat input capacity of 2.15 MMBtu/hr.
  - (2) One (1) air make-up unit, identified as MAU-2, with a maximum heat input capacity of 4.0 MMBtu/hr.
  - (4) Six (6) radiant tube heaters with a maximum heat input capacity of 0.20 MMBtu/hr each.
  - (5) Three (3) radiant tube heaters with a maximum heat input capacity of 0.15 MMBtu/hr each.
  - (6) Five (5) radiant tube heaters with a maximum heat input capacity of 0.08 MMBtu/hr each.
  - (7) One (1) office space heater with a maximum heat input capacity of 0.06 MMBtu/hr.
  - (8) One (1) office space heater with a maximum heat input capacity of 0.075 MMBtu/hr.
  - (9) One (1) office space heater with a maximum heat input capacity of 0.12 MMBtu/hr.

<b>Existing Approvals</b>
---------------------------

The source was issued Part 70 Operating Permit Renewal No. T039-32988-00185 on December 12, 2013. The source has since received the following approval:

- (a) Administrative Amendment No. 039-37025-00185 on May 27, 2016.

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

<b>Enforcement Issue</b>
--------------------------

There are no enforcement actions pending.

<b>Emission Calculations</b>
------------------------------

See Appendix A of this document for detailed emission calculations.

<b>County Attainment Status</b>
---------------------------------

The source is located in Elkhart County.



Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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.	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> 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 NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Emission Unit	Unrestricted Potential Emissions (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Surface Coating	285.7	285.7	285.7	0.0	0.0	345.0	0.0	45.5	28.44	Xylenes
Welding & Cutting	21.8	21.8	21.8	0.0	0.0	0.0	0.0	1.67	1.67	Manganese
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.03	0.22	3.38	0.08	0.07	Hexane
<b>Total Emissions</b>	<b>307.5</b>	<b>307.8</b>	<b>307.8</b>	<b>0.02</b>	<b>4.03</b>	<b>345.2</b>	<b>3.38</b>	<b>47.2</b>	<b>28.44</b>	<b>Xylenes</b>

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating***	102.8	102.8	102.8	0.0	0.0	249.0	0.0	23.0	9.90 Xylenes
Welding & Cutting	21.8	21.8	21.8	0.0	0.0	0.0	0.0	1.67	1.67 Manganese

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.03	0.22	3.38	0.08	0.07 Hexane
<b>Total PTE of Entire Source</b>	<b>124.6</b>	<b>124.8</b>	<b>124.8</b>	<b>0.02</b>	<b>4.03</b>	<b>249.2</b>	<b>3.38</b>	<b>24.7</b>	<b>9.90 Xylenes</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant". ** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . *** PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions from the surface coating booths are after dry filter control.									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

#### Federal Rule Applicability

#### Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO<sub>2</sub> and NO<sub>x</sub> under the Acid Rain Program.

- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Frame Coating / PM	DF	326 IAC 2-2	--	--	N <sup>1</sup>	--
Frame Coating/PM10	DF	326 IAC 2-2	>100	<100	Y	N
Frame Coating/PM2.5	DF	326 IAC 2-2	>100	<100	Y	N
Paint Booth 2 / PM	DF	326 IAC 2-2	--	--	N <sup>1</sup>	--
Paint Booth 2/PM10	DF	326 IAC 2-2	<100	<100	N <sup>2</sup>	N
Paint Booth 2/PM2.5	DF	326 IAC 2-2	<100	<100	N <sup>2</sup>	N
Frame Coating / PM*	DF	326 IAC 6-3-2	>100	<100	Y	N
Paint Booth 2 / PM*	DF	326 IAC 6-3-2	<100	<100	N <sup>2</sup>	N
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.						
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.						
PM*	For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.					
N <sup>1</sup>	Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.					
N <sup>2</sup>	CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.					
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator, DF = Dry Filter						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Frame Coating for PM/PM10/PM2.5. A CAM plan was submitted as part of a previous permit application and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

#### **New Source Performance Standards (NSPS)**

- (e) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the one (1) boiler (B-1), one (1) water heater, and nineteen (19) natural gas-fired units because each has a maximum heat input capacity of less than ten (10) million British thermal units per hour and the nineteen (19) natural gas-fired units are each not a steam generating unit as defined in §60.41c.
- (f) The requirements of the New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture as described in §60.310(a). This source coats metal RV and mobile home frames and chassis.
- (g) The requirements of the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks as described in §60.390(a). This source coats metal RV and mobile home frames and chassis.

- (h) The requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit, because the one (1) boiler (B-1), one (1) water heater, and nineteen (19) natural gas-fired units are each not reciprocating internal combustion engines.
- (i) 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 (NESHAPs)**

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), which is incorporated by reference as 326 IAC 20-14, are not included in the permit, because this source does not coat wood furniture or wood furniture components as defined in §63.801(a). This source coats metal RV and mobile home frames and chassis.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are not included in the permit, since this source does not perform plywood or composite wood products manufacturing and it is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source coats metal RV and mobile home frames and chassis.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source does not coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. This source coats metal RV and mobile home frames and chassis.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-80, 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) are not included in the permit, since although this source does coat miscellaneous metal parts, it is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2 because the source has limited its HAP emissions to below major source thresholds.

Previously, EPA took the position that facilities that are major sources of HAP on the first substantive compliance date of an applicable major source MACT standard must comply "permanently" with that standard, even if the source was subsequently to become an area source by limiting its PTE.

However, there are no temporal limitations included in the definitions of the terms "major source" or "area source". Therefore, EPA has reversed the determination that facilities that are major sources of HAP on the first substantive compliance date of an applicable major source MACT standard must comply "permanently" with that standard.

Accordingly, EPA has now determined that a major source which takes an enforceable limit on its PTE and takes measures to bring its HAP emissions below the applicable threshold becomes an area source, no matter when the source may choose to take measures to limit its PTE. That source, now having area source status, will not be subject thereafter to those requirements applicable to the source as a major source under CAA section 112, including, in particular, major source MACT standards – so long as the source's PTE remains below the applicable HAP emission thresholds.

Below is an internet link to the guidance memorandum the EPA has provided regarding this determinations.

[https://www.epa.gov/sites/production/files/2018-01/documents/reclassification\\_of\\_major\\_sources\\_as\\_area\\_sources\\_under\\_section\\_112\\_of\\_the\\_clean\\_air\\_act.pdf](https://www.epa.gov/sites/production/files/2018-01/documents/reclassification_of_major_sources_as_area_sources_under_section_112_of_the_clean_air_act.pdf)

- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN (326 IAC 20-63) are not included in the permit, since this source does not coat large appliances and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source coats metal RV and mobile home frames and chassis.
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-81, 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) are not included in the permit, since this source does not coat plastic parts and products and is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source coats metal RV and mobile home frames and chassis.
- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source coats metal RV and mobile home frames and chassis.
- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit for the one (1) boiler (B-1), one (1) water heater, and nineteen (19) natural gas-fired units, since this source is not a major source of HAPs as defined in §63.2, and the nineteen (19) natural gas-fired units are not industrial, commercial, or institutional boilers or process heaters as defined in §63.7575.
- (r) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJ, are not included in the permit, for the one (1) boiler (B-1), one (1) water heater, since gas-fired boilers, as defined in 40 CFR 63.11237, are specifically exempted from this rule, as indicated in 40 CFR 63.11195(e) and the nineteen (19) natural gas-fired units are each not considered a boiler.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, since this source does not conduct a paint stripping operation, does not perform spray applications to motor vehicles and mobile equipment as defined by 40 CFR 63.11180, or use spray application coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium.
- (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit, because the operations at this source fall under SIC code 3711 (NAICS Code: 336111), which is not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories). This source does not perform metal fabrication or finishing. This source manufactures and surface coats metal RV and mobile home chassis.

- (u) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

<b>State Rule Applicability - Entire Source</b>
---

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source is subject to 326 IAC 1-6-3.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration)  
This source has an unrestricted potential to emit greater than two hundred and fifty (250) tons per year of PM, PM10, PM2.5, and VOC.

- (1) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following units shall be less than the limits specified in the table below:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Surface Coating Line	Frame Coating	18.46	18.46	18.46
Spray Paint Booth	PB2	5.00	5.00	5.00

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide PM, PM10, and PM2.5 emissions to less than 250 tons per year, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (2) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the two (2) surface coating operations (Frame Coating and PB2) shall not exceed 249.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This existing source has a potential to emit (PTE) greater than ten (10) tons per year of any single HAP, and greater than twenty-five (25) tons per year of any combination of HAPs. However, the source has accepted the following limit; therefore, the requirements of 326 IAC 2-4.1 do not apply. In addition, pursuant to 326 IAC 2-4.1-1(b)(2), because this source would otherwise be specifically regulated by NESHAP 40 CFR 63, Subpart M, which was issued pursuant to Section 112(d) of the CAA, this source would be exempt from the requirements of 326 IAC 2-4.1 if it were a major source of HAPs.

- (1) The surface coating operation identified as Frame Coating was constructed prior to the applicability date of July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply to this operation.
- (2) The surface coating operation identified as PB2 was constructed after the applicability date of July 27, 1997. This booth has a potential to emit that is greater than ten (10) tons per year of any single HAP and greater than twenty-five (25) tons per of any combination of HAPs. However, the source has accepted source-wide limits on HAPs emissions as follows:

In order to render the source an area source of HAPs, the Permittee shall comply with the following:

- (A) The total input of any single HAP, including coating, dilution solvents, and cleaning solvents to the surface coating operations (Frame Coating and PB2) shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (B) The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Frame Coating and PB2) shall not exceed 23.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide emissions of any single HAP to less than ten (10) tons per 12 consecutive month period, and the source-wide emissions of total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the source an area source of HAPs.

- (d) 326 IAC 2-6 (Emission Reporting)  
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The limited potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (e) 326 IAC 2-7-6(5) (Annual Compliance Certification)  
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.
- (f) 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.
- (g) 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.



- (h) 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.
- (i) 326 IAC 6.5 (PM Limitations Except Lake County)  
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (j) 326 IAC 6.8 (PM Limitations for Lake County)  
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (k) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability – Individual Facilities</b>
---

Surface Coating Operations (Frame Coating and PB2)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-1(b)(15), the two (2) surface coating operations (Frame Coating and PB2), are each subject to the requirements of 326 IAC 6-3-2, since each has a potential paint usage of greater than 5 gallons per day.  
  
Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the Permittee shall comply with the following for the two (2) surface coating operations (Frame Coating and PB2):
    - (A) The surface coating booths shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) 326 IAC 8-1-6 (New facilities; General reduction requirements)  
This rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year; located anywhere in the state and are not otherwise regulated by other provisions of Article 8; 326 IAC 20-48; or 326 IAC 20-56.
  - (1) The two (2) surface coating operations (Frame Coating and PB2), were each constructed after January 1, 1980, each has potential VOC emissions of twenty-five (25) tons per year or more. However, each unit is regulated by 326 IAC 8-2-9 (Surface Coating Emission Limitations). Therefore, pursuant to 326 IAC 8-1-6(3)(A), each unit is not subject to the requirements of 326 IAC 8-1-6.
- (c) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)  
Pursuant to 326 IAC 8-2-2, the two (2) surface coating operations (Frame Coating and PB2), are each not subject to the requirements of 326 IAC 8-2-2, because each is not considered an automobile and light duty truck surface coating operation. This source only metal RV and mobile home frames and chassis.
- (d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)  
Pursuant to 326 IAC 8-2-1 and 326 IAC 8-2-9, the requirements of 326 IAC 8-2-9 are applicable to all facilities, considered existing after January 1, 1980, located in any county and that have

potential emissions of greater than 25 tons of VOC per year; or for which construction commenced after July 1, 1990, located in any county, that perform surface coating on metal parts or products under the SIC code of major groups #33, #34, #35, #36, #37, #38, and #39, and that have potential emissions greater than fifteen (15) pounds of VOC per day before add-on controls (and are not limited to less than 15 pounds per day before add-on controls). This source coats metal parts and products under SIC code 3711 (Motor Vehicles and Passenger Car Bodies).

- (1) The two (2) surface coating operations (Frame Coating and PB2) are located in Elkhart County, were constructed after July 1, 1990, apply surface coatings to metal parts and products and have potential emissions of greater than fifteen (15) pounds per day of VOC before add-on controls. Therefore, each unit is subject to the requirements of 326 IAC 8-2-9.

Pursuant to 326 IAC 8-2-9(c), for the surface coating of miscellaneous metal parts and products in the two (2) surface coating operations (Frame Coating and PB2), the source shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

- (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
  - (i) lacks color or opacity; and
  - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
- (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (C) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
  - (i) temperatures consistently above ninety-five (95) degrees Celsius;
  - (ii) detergents;
  - (iii) abrasive or scouring agents;
  - (iv) solvents;
  - (v) corrosive atmospheres;
  - (vi) outdoor weather at all times; or
  - (vii) similar environmental conditions.
- (D) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

Based on the MSDS submitted by the source and calculations made, the surface coating operations can comply with this requirement.

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

- (e) 326 IAC 8-10 (Automobile Refinishing)  
Pursuant to 326 IAC 8-10, the two (2) surface coating operations (Frame Coating and PB2), are each not subject to the requirements of 326 IAC 8-10, because each does not perform refinishing of after-market motor vehicle parts and thus do not meet the definition of automobile refinishing under 326 IAC 8-10-2(5). This source only surface coats metal RV and mobile home frames and chassis.

#### Insignificant Welding and Flame Cutting

- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (a) The insignificant welding consumes less than 625 pounds of weld wire or rod per day per process. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the insignificant welding is exempt from the requirements of 326 IAC 6-3.
  - (b) The insignificant flame cutting cuts less than 3,400 inches per hour of stock one (1) inch thickness or less per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(10), the insignificant flame cutting is exempt from the requirements of 326 IAC 6-3.

#### Natural Gas Combustion (B-1, Water Heater, and Heaters)

- (g) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heat)  
The requirements of 326 IAC 6-2 do not apply to the nineteen (19) natural gas-fired units, since each is not a source of indirect heat.

The natural gas-fired boiler (B-1) and the water heater are each a source of indirect heating, and were constructed before September 21, 1983. Therefore, pursuant to 326 IAC 6-2-1(c), the requirements of 326 IAC 6-2-3 are applicable.

Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating which has 10 MMBtu/hr heat input or less and which began operations after June 8, 1972, shall in

no case exceed 0.6 lb/MMBtu/hr heat input. Therefore natural gas-fired boiler (B-1) and the water heater shall each not shall not exceed 0.6 lb/MMBtu/hr of particulate.

Based on Appendix A and AP-42, the potential to emit PM from the one (1) natural gas-fired boiler (NG-B) are calculated as follows:

$$1.90 \text{ lb PM/MMCF} \times 1 \text{ MMCF}/1,020 \text{ MMBtu} = 0.00186 \text{ lb PM/MMBtu}$$

Therefore the natural gas-fired boiler (B-1) and the water heater are each able to comply with this rule without the use of a control device.

- (h) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
The one (1) boiler (B-1), one (1) water heater, and nineteen (19) natural gas-fired units are each not subject to 326 IAC 326 IAC 7-1.1, because each has potential sulfur dioxide (SO<sub>2</sub>) emissions of is less than 25 tons/year and 10 pounds/hour.
- (i) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)  
The one (1) boiler (B-1), one (1) water heater, and nineteen (19) natural gas-fired units are each not subject to 326 IAC 326 IAC 8-1-6, because each has potential VOC emissions of less than 25 tons/year.

#### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

- (a) The two (2) surface coating operations (Frame Coating and PB2) have applicable compliance determination conditions as specified below:
  - (1) The dry filters for particulate control shall be in operation and control emissions from the two (2) surface coating operations (Frame Coating and PB2) at all times that the units are in operation.
- (b) The two (2) surface coating operations (Frame Coating and PB2) have applicable compliance determination conditions as specified below:
  - (1) Volatile Organic Compounds (VOC) and HAP  
Compliance with the VOC and HAP limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ

reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

- (c) The two (2) surface coating operations (Frame Coating and PB2) compliance monitoring requirements are as follows:

Control	Emission Units	Parameter	Frequency	Range	Excursions and Exceedances
Dry Filters	Frame Coating and PB2	Overspray	Weekly	No Overspray – Presence of Overspray	Response Steps
			Monthly	No Change of Overspray- Noticeable Change in Overspray	
		Visual Check	Daily	Filter Placement, Integrity and Particle Loading	

These compliance determination and monitoring conditions are necessary because the dry filters for the spray booths two (2) surface coating operations (Frame Coating and PB2) must operate properly to assure compliance with 326 IAC 6-3 (Process Operations) and 40 CFR 64 (Compliance Assurance Monitoring), and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### Conclusion and Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 31, 2018. Additional information was received on September 8, 2018.

The operation of this stationary RV and mobile home chassis manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-39008-00185.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Emissions Summary**

Page 1 of 5 TSD App A

**Company Name:** Lippert Components, Inc.  
**Source Address:** 701 Collins Road, Elkhart, Indiana 46516  
**Permit Number:** T039-39008-00185  
**Reviewer:** Dominic Williams/Brian Wright

Uncontrolled Potential Emissions (tons/year)										
Pollutant										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Surface Coating	285.7	285.7	285.7	0.0	0.0	345.0	0.0	45.5	28.44	Xylenes
Welding & Cutting	21.8	21.8	21.8	0.0	0.0	0.0	0.0	1.67	1.67	Manganese
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.03	0.22	3.39	0.08	0.07	Hexane
<b>Total Emissions</b>	<b>307.5</b>	<b>307.8</b>	<b>307.8</b>	<b>0.02</b>	<b>4.03</b>	<b>345.2</b>	<b>3.39</b>	<b>47.2</b>	<b>28.44</b>	<b>Xylenes</b>

Potential to Emit After Issuance (tons per year)										
Pollutant										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPS	Highest Single HAP	
Surface Coating	102.8	102.8	102.8	0.0	0.0	249.0	0.0	23.0	9.90	Xylenes
Welding & Cutting	21.8	21.8	21.8	0.0	0.0	0.0	0.0	1.67	1.67	Manganese
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.03	0.22	3.39	0.08	0.07	Hexane
<b>Total Emissions</b>	<b>124.6</b>	<b>124.8</b>	<b>124.8</b>	<b>0.02</b>	<b>4.03</b>	<b>249.2</b>	<b>3.4</b>	<b>24.7</b>	<b>9.90</b>	<b>Xylenes</b>

Limited/Controlled Potential Emissions (tons/year)										
Pollutant										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPS	Highest Single HAP	
Surface Coating <sup>1, 2, 3</sup>	14.3	14.3	14.3	0.0	0.0	249.0	0.0	23.0	9.90	Xylenes
Welding & Cutting	21.8	21.8	21.8	0.0	0.0	0.0	0.0	1.67	1.67	Manganese
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.03	0.22	3.39	0.08	0.07	Hexane
<b>Total Emissions</b>	<b>36.1</b>	<b>36.3</b>	<b>36.3</b>	<b>0.02</b>	<b>4.03</b>	<b>249.2</b>	<b>3.39</b>	<b>24.7</b>	<b>9.90</b>	<b>Xylenes</b>

<sup>1</sup>PM/PM10/PM2.5 emissions from the two (2) surface coating operations (Frame Coating and PB2) are limited to render 326 IAC 2-2 (PSD) not

<sup>2</sup>VOC emissions from the two (2) surface coating operations (Frame Coating and PB2) are limited to render 326 IAC 2-2 (PSD) not applicable.

<sup>3</sup>Single and Total HAPs emissions from the two (2) surface coating operations (Frame Coating and PB2) are limited to render the source an area source of HAPs.

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

Page 2 of 5 TSD App A

**Company Name:** Lippert Components, Inc.  
**Source Address:** 701 Collins Road, Elkhart, Indiana 46516  
**Permit Number:** T039-39008-00185  
**Reviewer:** Dominic Williams/Brian Wright

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/ gal solids	Transfer Efficiency
<b>Frame Coating</b>																	
Black A.D. Enamel	12.6	27.50%	0.0%	27.5%	0.0%	72.50%	3.04	6.0	437.7	3.47	3.47	63.19	1,517	276.77	255.4	4.78	65%
Clean-up Solvent	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.28	6.0	39.9	6.40	6.40	10.64	255	46.59	0.00	-	65%
<b>Paint Booth 2 (PB2)</b>																	
Armorize Rust Inhibitive Frame Coating	7.7	36.00%	0.0%	36.0%	0.0%	64.00%	2.25	2.5	134.9	2.77	2.77	15.58	374.0	68.25	30.33	4.33	75%
Clean-up Solvent	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.28	2.5	16.6	6.40	6.40	4.43	106.4	19.41	0.00	-	75%

<b>Total Potential to Emit</b>	<b>78.77</b>	<b>1,890.49</b>	<b>345.01</b>	<b>285.7</b>
--------------------------------	--------------	-----------------	---------------	--------------

<b>Control Efficiency</b>	<b>95.0%</b>
<b>Controlled Emissions</b>	<b>14.29</b>
<b>PSD Limited Emissions</b>	<b>102.75</b>

**Methodology**

Particulate is controlled by dry filters that are 99.0% efficient

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

PSD Limit Emissions = Limited Emissions (lbs/hr) (enforceable limits in permit) \* (1ton/2000lbs) \* 8760 hrs/yr

**Appendix A: Emission Calculations**  
**HAP Emission Calculations from Surface Coating**

Page 3 of 5 TSD App A

**Company Name:** Lippert Components, Inc.  
**Source Address:** 701 Collins Road, Elkhart, Indiana 46516  
**Permit Number:** T039-39008-00185  
**Reviewer:** Dominic Williams/Brian Wright

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Throughput (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)
<b>Frame Coating</b>										
Black A.D. Enamel	12.6	3.04	6.00	18.24	0.00%	0.00%	0.00%	0.0	0.0	0.0
Clean-up Solvent	6.4	0.28	6.00	1.66	0.00%	0.00%	0.00%	0.0	0.0	0.0
<b>Paint Booth 2 (PB2)</b>										
Armorize Rust Inhibitive Frame Coating	7.7	2.25	2.50	5.62	15.00%	8.00%	1.00%	28.44	15.17	1.90
Clean-up Solvent	6.4	0.28	2.50	0.69	0.00%	0.00%	0.00%	0.0	0.0	0.00
<b>Totals</b>								<b>28.44</b>	<b>15.17</b>	<b>1.90</b>

<b>Total HAP Potential Emissions (tons/yr)</b>	<b>45.5</b>
--	-------------

**METHODOLOGY**

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



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

Page 4 of 5 TSD App A

**Company Name:** Lippert Components, Inc.  
**Source Address:** 701 Collins Road, Elkhart, Indiana 46516  
**Permit Number:** T039-39008-00185  
**Reviewer:** Dominic Williams/Brian Wright

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
<b>WELDING</b>												
Submerged Arc	2	1	24	0.036	0.011			0.072	0.022	0.0	0.0	0.022
Metal Inert Gas (MIG)(carbon steel)	60	12	288	0.0055	0.0005			3.960	0.360	0.0	0.0	0.360
Stick (E7018 electrode)	0	0	0	0.0211	0.0009			0.0	0.0	0.0	0.0	0.0
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0	0.0055	0.0005			0.0	0.0	0.0	0.0	0.0
Oxyacetylene(carbon steel)		0	0	0.0055	0.0005			0.0	0.0	0.0	0.0	0.0
<b>FLAME CUTTING</b>												
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	4	1	24	0.1622	0.0005	0.0001	0.0003	0.934	0.0	0.0	0.0	0.0
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.0	0.0	0.0	0.0	0.0
Plasma**	0	0	0	0.0039				0.0	0.0	0.0	0.0	0.0
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								4.97	0.38	0.0	0.0	0.38
Potential Emissions lbs/day								119.19	9.17	0.0	0.0	9.17
Potential Emissions tons/year								21.75	1.67	0.0	0.0	1.67

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick  
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

# Appendix A: Emissions Calculations

Page 5 of 5 TSD App. A

## Natural Gas Combustion Only All Natural Gas-fired Heaters, Air Make-up Units, and Boilers

Company Name: Lippert Components, Inc.  
Source Address: 701 Collins Road, Elkhart, Indiana 46516  
Permit Number: T039-39008-00185  
Reviewer: Dominic Williams/Brian Wright

Heat Input Capacity MMBtu/hr	Number of Units	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
2.15	1	2.15	18.46	Air Make-up Unit MAU-1
4	1	4	34.35	Air Make-up Unit
0.2	6	1.2	10.31	Radiant Tube Heaters
0.15	3	0.45	3.86	Radiant Tube Heaters
0.08	5	0.4	3.44	Radiant Tube Heaters
0.06	1	0.06	0.52	Space Heater
0.075	1	0.075	0.64	Space Heater
0.12	1	0.12	1.03	Space Heater
0.032	1	0.032	0.27	Water Heater
0.9	1	0.9	7.73	Boiler B-1
<b>9.4</b>		<b>80.6</b>	<b>Total</b>	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC
	1.9	7.6	7.6	0.6	100	5.5
					**see below	
Potential Emission in tons/yr	0.08	0.31	0.31	0.02	4.03	0.22
						3.39

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### Hazardous Air Pollutants (HAPs)

HAPs - Organics						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
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	8.5E-05	4.8E-05	3.0E-03	7.3E-02	1.4E-04	<b>0.08</b>

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
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	2.0E-05	4.4E-05	5.6E-05	1.5E-05	8.5E-05	<b>2.2E-04</b>
Methodology is the same as above.					<b>Total HAPs</b>	<b>0.08</b>
The five highest organic and metal HAPs emission factors are provided above.					<b>Worst HAP</b>	<b>0.07</b>
Additional HAPs emission factors are available in AP-42, Chapter 1.4.						



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

August 7, 2018

Jason Demeter  
Lippert Components, Inc.  
3501 CR 6 E  
Elkhart, IN 46514

Re: Public Notice  
Lippert Components, Inc. Plant 59  
Permit Level: Title V Renewal  
Permit Number: 039-39008-00185

Dear Mr. Demeter:

Enclosed is a copy of your draft Title V Operating Permit Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Elkhart Truth in Elkhart, IN publish the abbreviated version of the public notice no later than August 8, 2018. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Elkhart Public Library, 300 S 2nd St in Elkhart, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

*Theresa Weaver*

Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 1/9/2017



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 7, 2018

Elkhart Truth  
421 South Second Street  
P.O. Box 487  
Elkhart, Indiana 46515

\* Publishes

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Lippert Components, Inc. Plant 59, Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 8, 2018.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

*Theresa Weaver*

Theresa Weaver  
Permit Branch  
Office of Air Quality

Permit Level: Title V Operating Permit Renewal  
Permit Number: 039-39008-00185

Enclosure

PN Newspaper Letter 1/9/2017



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

August 7, 2018

To: Elkhart Public Library

From: Jenny Acker, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Lippert Components, Inc. Plant 59**  
**Permit Number: 039-39008-00185**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library 1/9/2017



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

### Notice of Public Comment

**August 7, 2018**  
**Lippert Components, Inc. Plant 59**  
**039-39008-00185**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover Letter 1/9/2017



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

### AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

August 7, 2018

A 30-day public comment period has been initiated for:

**Permit Number:** 039-39008-00185  
**Applicant Name:** Lippert Components, Inc. Plant 59  
**Location:** Elkhart, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>


Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management  
Office of Air Quality, Permits Branch  
100 North Senate Avenue  
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at [chammack@idem.IN.gov](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification 1/9/2017

# Mail Code 61-53

IDEM Staff	TAWEAVER 8/7/2018 Lippert Components Inc 039-39008-00185 (draft)			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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Jason Demeter Lippert Components Inc 3501 CR 6 E Elkhart IN 46514 (Source CAATS)										
2		Erick Click Lippert Components Inc 3501 CR 6 E Elkhart IN 46514 (RO CAATS)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Joe Kinder DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--