



# Lippert Components Inc.

A Division of Drew Industries, Inc.  
2703 College Ave ♦ Goshen, Indiana 46528  
Phone 574.535.1125  
Fax 574.312.6309

RECEIVED  
DEC 29 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE A Q PROGRAM

27 December 2011

DEQ Air Quality Program  
1410 N Hilton  
Boise, ID 83706 .

RE: Lippert Components, Inc. – Twin Falls  
427 Hankins Road South  
Twin Falls, ID  
Facility ID No. 083-00100

Dear Sir or Madam:

Enclosed please find the necessary form (Form GI), copies of two (2) spreadsheets used to calculate potential emissions and one (1) spreadsheet describing facility emissions of criteria pollutants. No changes to the facility, processes or materials are changing thus only Form GI is being submitted.

The facility located at the above address was recently acquired by Lippert Components, Inc. (LCI). After review of the documents submitted in support of the PTC issued to Dexter Chassis Group on April 6, 2011, LCI has discovered that the usage rate (18.8 gallons/day) used to determine emissions is inaccurate. We are submitting Form GI and requisite spreadsheets to portray the accurate consumption of 50 gallons/24 hour period or 2.08 gallons/Hr.

Should you have any questions or concerns in regards to this matter please feel free to contact me at 574.312.6309 or via email at [eclick@lci1.com](mailto:eclick@lci1.com).

Sincerely,  
**Lippert Components, Inc.**

Erick Click  
Director of Safety Health & Environmental Affairs

Enclosures  
Cc: Eric Clark



**DEQ AIR QUALITY PROGRAM**  
 1410 N. Hilton, Boise, ID 83706  
 For assistance, call the  
**Air Permit Hotline – 1-877-5PERMIT**

General Information **Form GI**

Revision 7  
 2/18/10

Please see instructions on page 2 before filling out the form.

**All information is required. If information is missing, the application will not be processed.**

**IDENTIFICATION**

1. Company Name		2. Facility Name:	
Lippert Components, Inc.		Lippert Components, Inc. - Twin Falls	
3. Brief Project Description:	Lippert Components recently purchased the facility from Dexter Chassis Group. In reviewing the documents submitted with the original application and after reviewing the facility we believe that the usage of coatings/hr was underestimated.		
	No equipment is being added and nothing materially is being changed.		

**FACILITY INFORMATION**

4. Primary Facility Permit Contact Person/Title	Erick Click	Director SH&E Affairs
5. Telephone Number and Email Address	574.312.6309	eclick@lci1.com
6. Alternate Facility Contact Person/Title	K.C. Stevens	General Manager
7. Telephone Number and Email Address	208.735.1546	kstevens@lci1.com
8. Address to Which the Permit Should be Sent	2703 College Ave.	
9. City/County/State/Zip Code	Goshen	Elkahrt IN 46528
10. Equipment Location Address (if different than the mailing address above)	427 Hankins Road South	
11. City/County/State/Zip Code	Twin Falls	Twin Falls ID 83303
12. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13. SIC Code(s) and NAICS Code	Primary SIC: 3795	Secondary SIC: NAICS: 336214
14. Brief Business Description and Principal Product	Weldment and coating of steel components to produce a recreational vehicle frame.	
15. Identify any adjacent or contiguous facility that this company owns and/or operates	NA	
16. Specify the reason for the application	<input checked="" type="checkbox"/> Permit to Construct (PTC) <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p><b>For Tier I permitted facilities only:</b> If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit.</p> <input type="checkbox"/> Incorporate the PTC at the time of the Tier I renewal  <input type="checkbox"/> Co-process the Tier I modification and PTC  <input type="checkbox"/> Administratively amend the Tier I permit to incorporate the PTC upon your request (IDAPA 58.01.01.209.05.a, b, or c)         </div> <input type="checkbox"/> Tier I Permit <input type="checkbox"/> Tier II Permit <input type="checkbox"/> Tier II/Permit to Construct	

**CERTIFICATION**

In accordance with IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

17. Responsible Official's Name/Title	Erick Click	Director SH&E Affairs
18. Responsible Official's Signature		Date: 12.27.11
19. <input checked="" type="checkbox"/> Check here to indicate that you would like to review the draft permit prior to final issuance.		

### Emissions Inventory (Criteria Pollutants)

Emissions Unit	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	Lead
	TPY <sup>A</sup>	TPY <sup>A</sup>	TPY <sup>A</sup>	TPY <sup>A</sup>	TPY <sup>A</sup>	TPY <sup>A</sup>
Point Sources						
Paint Booth	0.179 <sup>B</sup>	NA	NA	NA	10.64	NA
Heating Units <sup>C</sup>	7.40E-02	5.85E-03	0.974	0.818	5.36E-02	4.87E-06
Welding Operations <sup>C</sup>	0.142	NA	NA	NA	NA	NA
<b>Total</b>	<b>0.40</b>	<b>5.85E-03</b>	<b>0.97</b>	<b>0.82</b>	<b>10.69</b>	<b>4.87E-06</b>

<sup>A</sup> TPY base on 8,760 hours/year

<sup>B</sup> PM<sub>10</sub> Emissions are shown after transfer efficiency and controls

<sup>C</sup> Emissions for these units are as described in the Statement of Basis for Project No. 60614 written by Eric Clark.

**Lippert Components, Inc - Twin Falls Emission Calculations - Permit Request**

<b>Operational Data</b>		
a	Max Gallons of Paint Consumed (gal/day)	50.00
b	Max Gallons of Paint Consumed (a x 365)	18250.00
c	Hours per day	24.00
d	Paint sprayed (24 hr Average) (gal/hr)	2.08
e	Paint density (from MSDS) (lbs/gal)	9.34
f	Paint sprayed (24 Hr Average) (lbs/hr)	19.46

<b>Emission Calculations - Solids</b>		
g	Maximum possible solids (% by wt) (MSDS states 41.5 %)	100.00
h	Max possible solids content (lbs/gal)	9.34
i	Paint solids transfer efficiency (%)	0.65
j	Percent of solids reaching filter (1- j) (%)	0.35
k	Paint filter efficiency (%)	0.99
l	Max possible PM emitted (lbs/hr 24 Hr-Avr)	0.04

<b>Emission Calculations - VOC</b>		
	Maximum possible volatile (% by wt)	0.12
	Max possible volatile content (lbs/gal)	1.17
	Max possible VOC emitted (lbs/hr 24 Hr-Avr)	2.43
	TPY	10.64

<b>Emission Calculations - Solid TAPs</b>		
	Solid TAP/HAP Content (% by wt) (carbon black 1333-86-4)	1.32
	Solid TAP/HAP Content (lbs/gal) (carbon black 1333-86-4)	0.12
	Paint solids transfer efficiency (%)	0.65
	Percent of solids reaching filter (1- q) (%)	0.35
	Paint filter efficiency (%)	0.99

<b>Emission Calculations - Solid TAPs (From Welding)</b>		
	Chromium (AP-42 0.01lb/10,000 lbs wire) (15 lbs wire/day max)	
	Chromium IV (AP-42 No Data)	
	Cobalt (AP-42 <0.01lb/10,000 lbs wire) (15 lbs wire/day max)	
	Manganese (AP-42 3.18 lb/10,000 lbs wire) (15 lbs wire/day max)	
	Nickel (AP-42 0.01lb/10,000 lbs wire) (15 lbs wire/day max)	
	Lead (AP-42 No Data)	

<b>Emission Calculations - VOC TAPs</b>		
	VOC TAP/HAP Content (% by wt) (EGBG 111-76-2)	2.44

<b>Emission Calculations - VOC TAPs</b>		
	VOC TAP/HAP Content (% by wt) (DGME 34590-94-8)	1.73

<b>Emission Calculations - Fugitive Weld Fumes</b>		
	From AP-42: 3,000 lbs weld wire/yr x 5.2 lbs fume/1,000 pounds wire = pounds fume/year	15.60

<b>Modeling Criteria</b>		
Before Controls (lbs/hr)	After Controls (lbs/hr)	Emissions Screening Level (lbs/hr)

0.09		
	0.0005	<b>0.23</b>

0.000001	6.25E-07	<b>0.033</b> <i>No Value</i>
0.000001	6.25E-07	<b>0.0033</b>
0.000199	1.99E-04	<b>0.067</b>
0.000001	6.25E-07	<b>0.000027</b> <i>No Value</i>

0.47	0.47	<b>8.0</b>
------	------	------------

0.34	0.34	<b>8.0</b>
------	------	------------

**Product & Usage Information**

Product & Usage Information							VOCs		
Product Name	Part Number	Density (lbs/Gallon)	VOC % BW	PM% BW (IDEQ Assumes 100%)	Max Gallons/Hr	Max Lbs/Hr	VOC Lbs/Hr	VOC TPY PTE 8,760 Hours	VOC (lbs/gal)
Patriot HAPs Free W/R Enamel	6-kma-0210	9.34	12.48%	100%	2.08	19.46	2.43	10.64	1.17

<b>PM10</b>					
Product Name	(a) PM Sprayed (lbs)	(b) Overspray (1- TE)	(c) Filter Escape (1-FE)	PM Emissions (a) x (b) x (c) (lbs)	PM TPy PTE 8,760 Hrs
Patriot HAPs Free W/R Enamel	19.46	0.35	0.01	0.041	0.179

**Speciated (TAP)**

Product Name	TAP EGBG 111-76-2			TAP Carbon Black 1333-86-4			TAP DGME 34590-94-8					
	% by wt	PTE Emissions	Lbs/Hr	Emission Screening Level Lbs/Hr	% by wt	PTE Emissions*	Lbs/Hr	Emission Screening Level Lbs/Hr	% by wt	PTE Emissions	Lbs/Hr	Emission Screening Level Lbs/Hr
Patriot HAPs Free W/R Enamel	2.44%	2.08	0.47	8.00	1.32%	2.36E-03	5.39E-04	0.23	1.73%	1.47	0.34	40.00

\* Carbon Black is a solid thus the same formulation was used as used to calculate PM emissions, accounting for both transfer efficiency and filter efficiency.