August 7, 2001

Mr. Michael Zimmerman,
Environmental Director
Millennium Products, Inc. and Millennium Van Tops, Inc.
P.O. Box 1186
Elkhart, IN 46515-1186

Re: AA 039-14485-00067
Fourth Administrative Amendment to
Part 70 T039-7096-00067

Dear Mr. Zimmerman:

Millennium Products, Inc. was issued a Part 70 Permit on December 28, 1999 for a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications. On June 11, 2001 a letter was received requesting that two spray guns (chop guns CG-01 and CG-02) used to apply resin and catalyst be switched from HVLP type to FIT type. The new spray guns have greater transfer efficiencies, resulting in a decrease in the potential to emit. Therefore, the operating permit will be amended administratively to incorporate this change. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (the language removed is shown with a ~~strikeout~~ and the added is shown in **bold)**:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application**, two (2) FIT chop guns (CG-01 and CG-02)**, and ~~four (4)~~ **and two (2)** HVLP chop guns (~~CG-01, CG-02,~~ CG-03~~,~~ and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application**, two (2) FIT chop guns (CG-01 and CG-02)**, and ~~four (4)~~ **and two (2)** HVLP chop guns (~~CG-01, CG-02,~~ CG-03~~,~~ and CG-04) for resin and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

(b) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of two (2) HVLP guns (PG-01 and PG-02), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

(c) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.

(d) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-4439-00067, issued May 30, 1996, and 326 IAC 8-1-6 (New facilities; general reduction requirements), compliance for the fiberglass reinforced plastic manufacturing operations (B5, B6, and B7), surface coating operations (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall be accomplished by the following:

(a) All booths shall utilize **Fluid Impingement Technology (FIT) or high volume low pressure (HVLP)** ~~air assisted~~ spray applicators at all times for gel coat and chop operations;

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Heaney, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7870 to speak directly to Mr. Heaney. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/MH

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section - Greg Wingstrom
Compliance Data Section - Karen Nowak
IDEM Northern Regional Office
Permit Review Section 1 - Gary Freeman

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Millennium Products, Inc.
57755 Holiday Place
Elkhart, Indiana 46517

(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.

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.: T039-7096-00067	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 28, 1999

First Administrative Amendment 039-11793-00067, issued February 22, 2000
Second Administrative Amendment 039-12130-00067, issued August 4, 2000
Third Administrative Amendment 039-14485-00067, issued March 14, 2001

4st Administrative Amendment: AA039-14485-00067	Pages Affected: 5, 28
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 7, 2001

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

The Permittee owns and operates a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

Responsible Official:	Kathy Miller
Source Address:	57755 Holiday Place, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 1186, Elkhart, Indiana 46517
Phone Number:	(219) 293-3840
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Synthetic Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

(b) Surface coating operations contained in two (2) spray booths (B1and B8), consisting of two (2) HVLP guns (PG-01 and PG-02), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

(c) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.

(d) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

(e) One sanding / grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a dust collector with a particulate matter control efficiency of 99%, exhausting inside the building.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

(b) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of two (2) HVLP guns (PG-01 and PG-02), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

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(d) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-4439-00067, issued May 30, 1996, and 326 IAC 8-1-6 (New facilities; general reduction requirements), compliance for the fiberglass reinforced plastic manufacturing operations (B5, B6, and B7), surface coating operations (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall be accomplished by the following:

(a) All booths shall utilize Fluid Impingement Technology (FIT) or high volume low pressure (HVLP) spray applicators at all times for gel coat and chop operations;

(b) The average styrene concentration in the resin used in the chop coat booths and the gel coat booths shall not exceed 40%;

(c) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75%; and,

(d) Acetone shall be used to clean spray guns used from spray coating of gelcoat and resins. Lacquer thinner shall be used to clean spray guns used from surface coating and touch-up painting.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to