

March 8, 2002

Mr. Anthony Marchetti  
Delivery Concepts, Inc.  
58356 C. R. 3 South  
Elkhart, Indiana 46517

Re: **039-15535-00557**  
First Notice Only Change to  
MSOP: **039-14380-00557**

Dear Mr. Marchetti:

Delivery Concepts, Inc. was issued Minor Source Operating Permit (039-14380-00557) on September 27, 2001, for a fiberglass mini truck body manufacturing operation. A letter requesting changes to this permit was received on February 1, 2002. Pursuant to the provisions of 326 IAC 2-6.1-6(d)(2), a notice only change to this permit is hereby approved as described below.

Delivery Concepts, Inc. has requested the incorporation of the most recent version of the Unified Emission Factors for Open Molding of Composites, Composites Fabricators Association (July 23, 2001). The July 23<sup>rd</sup> emission factors take into account utilization of FIT for emission reduction. Delivery Concepts, Inc. utilizes FIT for gel coating and would like to take credit for these emission reductions.

To incorporate the proposed emission factors, the following change is made. Deletion of language appear as ~~strikeouts~~ and new language in **bold**:

The only change required is to Condition D.1.2(a)(2) which specifies the emission factors that must be used to determine the resin and gel coat emissions.

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, ~~April 1999~~ **July 23, 2001**, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

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

Attachments

SDF

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Tony Pelath and Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**NEW SOURCE CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Delivery Concepts, Incorporated  
29301 West Mishawaka Road  
Elkhart, Indiana 46517**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit: 039-14380-00557	Date Issued: September 27, 2001
First Notice Only Change No.: 039-15535-00557	Affected Page: 16
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 8, 2002

- (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) The resins and gelcoats usage shall be limited to the following maximum HAP monomer contents:
- (1) The source shall utilize resin with a maximum styrene content of 35%.
  - (2) The source shall utilize gelcoats with a maximum styrene content of 37%.
  - (3) The fiberglass chop, polyester resin and gelcoat operations shall apply materials using nonatomized mechanical application equipment only.
    - (i) Flows from the applicator, shall be in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified in this condition is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. The HAP monomer content limits for resins and gel coats within each category, shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below: