



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: April 19, 2007
RE: Therma Tru Corporation / 033-17546-00019
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721**

(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.: T 033-17546-00019	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 19, 2007 Expiration Date: April 19, 2012

TABLE OF CONTENTS

A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [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(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	9
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]	
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(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [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	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	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.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	19
	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]	
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	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.17 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Door Assembly 27

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

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

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

D.1.5 Particulate [326 IAC 6-3-2]

D.1.6 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A]
[Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

D.1.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic
Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482]
[40 CFR 63.4483(b)] [40 CFR 63.4581]

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

D.1.9 Particulate Control [326 IAC 2-7-6(6)]

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

D.1.10 Monitoring [40 CFR 64]

D.1.11 Visible Emissions Notations

D.1.12 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR 64]

D.1.13 Broken or Failed Bag Detection

D.1.14 Cyclone Failure Detection

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

D.1.15 Record Keeping Requirements

D.1.16 Reporting Requirements

D.1.17	Notification Requirements [40 CFR 63.4510]	
D.1.18	Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]	
D.2	FACILITY OPERATION CONDITIONS: SMC Operations subject to NESHAP WWWW	34
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.2.1	PSD Minor Limits [326 IAC 2-2]	
D.2.2	Particulate Matter (PM) [326 IAC 6-3]	
	Compliance Determination Requirements	
D.2.3	Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]	
D.2.4	Particulate Control [326 IAC 2-7-6(6)]	
	Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.2.5	Visible Emissions Notations	
D.2.6	Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.2.7	Broken or Failed Bag Detection	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.2.8	Record Keeping Requirements	
D.2.9	Reporting Requirements	
D.2.10	General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]	
D.2.11	NESHAP WWWW Requirements [40 CFR Part 63, Subpart WWWW]	
D.2.12	One Time Deadlines Relating to NESHAP WWWW	
D.3	FACILITY OPERATION CONDITION: Insignificant Activities	57
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.3.1	Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.3.2	Volatile Organic Compounds (VOC) [326 IAC 8-3-5]	
D.3.3	Particulate [326 IAC 6-3-2]	
D.4	FACILITY OPERATION CONDITION: Deflashing station.....	59
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.4.1	Particulate [326 IAC 6-3-2]	
D.4.2	Minor Source Modification (PM and PM ₁₀) [326 IAC 2-7-10.5(d)(4)(C)]	
	Compliance Determination Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]	
D.4.3	Particulate Control [326 IAC 2-7-6(6)]	
	Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.4.4	Visible Emissions Notations	
D.4.5	Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.4.6	Broken or Failed Cartridge Detection	
	Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.4.7	Record Keeping Requirements	
Certification		62
Emergency Occurrence Report		63
Part 70 Quarterly Reports		65
Quarterly Deviation and Compliance Monitoring Report		68

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(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a metal and fiberglass entry door manufacturing source.

Source Address:	108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address:	108 Mutzfeld Road, Butler, Indiana 46721
General Source Phone Number:	260 - 868 - 5811
SIC Code:	3089 and 3442
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of the 28 major source categories

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) One door skin gluing operation, identified as EU2, installed in 1989, equipped with dry filters, exhausting to Stack 1.1, capacity: 360 doors per hour.
- (b) One (1) flowcoating operation, identified as EU3, replaced in 2000, consisting of one (1) flow-coater, equipped with filters, one (1) flash off tunnel and one (1) paint cure oven, and exhausting to Stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4, respectively, capacity: 360 metal doors per hour.
- (c) One (1) machining station, identified as EU4, installed in 1989, using a dust collector (DC1) for particulate emission control and exhausting to Stack DC1-1, capacity: 360 doors per hour and 16,200 pounds per hour, consisting of the following:
 - (1) MJ machining center (EU4-1).
 - (2) Online boring (EU4-2).
 - (3) Single end rail boring machine (EU4-3), with a capacity of 240 end rails per hour.
- (d) One (1) Door Assembly Line, installed in 2000, capacity: 20,250 pounds of doors per hour or 360 doors per hour, consisting of:
 - (1) One (1) adhesive application station, identified as D2-APP1, equipped with dry filters, exhausting through Stack 18.2, capacity: 43 pounds of adhesive per hour or 360 doors per hour.
 - (2) One (1) electric glue curing oven, identified as D2-OV2, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity: 360 doors per hour.

- (3) One (1) door foam injection system, identified as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 360 doors per hour.
- (4) One (1) door machining station, identified as D2-MS1, including an online boring center (D2-MS1-1), equipped with a baghouse and cyclone connected in series, identified as DC2, exhausting through Stack 20.1, capacity: 360 doors per hour or 18,000 pounds per hour.
- (e) Machining centers connected to dust collector DC3 and exhausting to stack DC3-1, as follows:
 - (1) Two (2) CNC Thermwood machining centers for Patio Doors, identified as PA-1, installed in 2006, capacity: 11.25 patio door units per hour, each.
 - (2) Three (3) KVAL cutout machines, identified as CO-1, CO-2 and CO-3, installed in 1993, 2005 and 2000, respectively, capacity: 50 units per hour, each.
 - (3) One (1) Door Hinger, identified as DH-1, installed prior to 1991, capacity: 15.63 doors per hour.
- (f) One (1) double cut saw, identified as DCS-1, installed in 2004, equipped with a Torit downflo baghouse and exhausting indoors, capacity: 130 door skins per hour.
- (g) One (1) concrete door adhesive spraying operation, identified as CD-2, installed in 2005, equipped with dry filters and exhausting indoors, capacity: 48 units per hour.
- (h) One (1) Sheet Molding Compound (SMC) Production Line, identified as SMC2, installed in 2000, capacity: 18,500 pounds of molding compound per hour, consisting of:
 - (1) Two (2) calcium carbonate silos, identified as SILO1 and SILO2, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour, each, capacity: 200,000 pounds of calcium carbonate, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (2) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (3) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (i) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (j) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC)

manufacturing operation.

- (k) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (l) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (m) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (n) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (o) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (p) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (q) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (r) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (s) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (t) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 through 25, installed in 2005, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (u) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking. [326 IAC 6-3-2]
- (l) Four (4) five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (m) Two (2) five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (n) Six (6) above ground resin storage tanks, identified as Tanks 1 through 6, exhausting through stack 17.1 and/or stack 17.2 capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (o) Five (5) resin holding tanks consisting of two (2) tanks, identified as A Side-Tank 1 and A Side-Tank 2 capacity: 1,500 gallons of resin each, and three (3) tanks, identified B Side-1 through B Side-3, capacity: 80 gallons of resin, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (p) One (1) 6,300 gallon tank storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (r) Activities with particulate emissions less than 5 lbs/hour or 25 lbs/day:
 - (2) Three (3) fiberglass skin cut down saws (FS-1, FS-2 and FS-3) [326 IAC 6-3-2].
 - (3) One (1) sanding booth (FS-4) [326 IAC 6-3-2].

A.4 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, T 033-17546-00019, 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]

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, OAQ, 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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 July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (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.
- (b) 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 or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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, and 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 Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
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 Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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)(9) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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 033-17546-00019 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 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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 non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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(c), 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.17 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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modification 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.19 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 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.20 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),(c), or (e) 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
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),(c), or (e). 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), (c)(1), and (e)(2).

(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(36)) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at in 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(c)]
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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

B.22 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.23 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.24 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.25 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 5-1-3 (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 or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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).

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.7 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
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling)

Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 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.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for

new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 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
- (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.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 15, 1999.
- (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.14 Risk Management Plan [326 IAC 2-7-5(12)] [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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (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;
 - (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 maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 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]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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 (32) ("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
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date post-marked 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Door Assembly

- (a) One door skin gluing operation, identified as EU2, installed in 1989, equipped with dry filters, exhausting to Stack 1.1, capacity: 360 doors per hour.
- (b) One (1) flowcoating operation, identified as EU3, replaced in 2000, consisting of one (1) flowcoater, equipped with filters, one (1) flash off tunnel and one (1) paint cure oven, and exhausting to Stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4, respectively, capacity: 360 metal doors per hour.
- (c) One (1) machining station, identified as EU4, installed in 1989, using a dust collector (DC1) for particulate emission control and exhausting to Stack DC1-1, capacity: 360 doors per hour and 16,200 pounds per hour, consisting of the following:
 - (1) MJ machining center (EU4-1).
 - (2) Online boring (EU4-2).
 - (3) Single end rail boring machine (EU4-3), with a capacity of 240 end rails per hour.
- (d) One (1) Door Assembly Line, installed in 2000, capacity: 20,250 pounds of doors per hour or 360 doors per hour, consisting of:
 - (1) One (1) adhesive application station, identified as D2-APP1, equipped with dry filters, exhausting through Stack 18.2, capacity: 43 pounds of adhesive per hour or 360 doors per hour.
 - (2) One (1) electric glue curing oven, identified as D2-OV2, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity: 360 doors per hour.
 - (3) One (1) door foam injection system, identified as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 360 doors per hour.
 - (4) One (1) door machining station, identified as D2-MS1, including an online boring center (D2-MS1-1), equipped with a baghouse and cyclone connected in series, identified as DC2, exhausting through Stack 20.1, capacity: 360 doors per hour or 18,000 pounds per hour.
- (e) Machining centers connected to dust collector DC3 and exhausting to stack DC3-1, as follows:
 - (1) Two (2) CNC Thermwood machining centers for Patio Doors, identified as PA-1, installed in 2006, capacity: 11.25 patio door units per hour, each.
 - (2) Three (3) KVAL cutout machines, identified as CO-1, CO-2 and CO-3, installed in 1993, 2005 and 2000, respectively, capacity: 50 units per hour, each.
 - (3) One (1) Door Hinger, identified as DH-1, installed prior to 1991, capacity: 15.63 doors per hour.
- (f) One (1) double cut saw, identified as DCS-1, installed in 2004, equipped with a Torit downflo baghouse and exhausting indoors, capacity: 130 door skins per hour.
- (g) One (1) concrete door adhesive spraying operation, identified as CD-2, installed in 2005, equipped with dry filters and exhausting indoors, capacity: 48 units per hour.

(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]

Pursuant to SSM 033-12630-00019, issued December 5, 2000, the use of VOC, including coatings, dilution solvents, and cleaning solvents at EU3 shall be limited to less than 74.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the increase from the modification in potential to emit of VOC from EU3 to less than forty (40) tons per year. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator 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, excluding water, as delivered to the applicators at D2-APP1 and EU3.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of D2-APP1 and EU3 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the one door skin gluing operation (EU2), the one (1) adhesive application station (D2-APP1) and the one (1) concrete door adhesive spraying operation (CD-2) shall 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.

D.1.5 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the machining station (EU4-1, EU4-2 and EU4-3) shall not exceed 16.65 pounds per hour, when operating at a process weight rate of 16,200 pounds per hour (8.1 tons per hour).
- (b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the door machining station (D2-MS1 and D2-MS1-1) shall not exceed 17.87 pounds per hour, when operating at a process weight rate of 18,000 pounds per hour (9.0 tons per hour).
- (c) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the two (2) CNC Thermwood machining centers (PA-1) shall not exceed 2.15 pounds per hour, each, when operating at a process weight rate of 765 pounds per hour (0.38 tons per hour), each.
- (d) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the three (3) KVAL cutout machines (CO-1, CO-2 and CO-3) shall not exceed 4.70 pounds per hour, each, when operating at a process weight rate of 2,450 pounds per hour (1.225 tons per hour), each.
- (e) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the one (1) Door Hinger (DH-1) shall not exceed 2.03 pounds per hour, when operating at a process weight rate of 703 pounds per hour (0.352 tons per hour).
- (f) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the one (1) double cut saw (DCS-1) shall not exceed 4.72 pounds per hour, when operating at a process weight rate of 2,470 pounds per hour (1.235 tons per hour).

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, Notification Requirements.

D.1.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage and content limitations contained in Conditions D.1.1 and D.1.2 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 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.1.9 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Condition D.1.5, the dust collector, baghouse and cyclone for particulate control shall be in operation and control emissions from EU4-1, EU4-2, EU4-3, D2-MS1, D2-MS1-1, PA-1, CO-1, CO-2, CO-3, DH-1 and DCS-1 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.10 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 1.1 and/or 18.2) 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 reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks 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 in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3 stack exhausts (Stacks DC1-1, 20.1, DC3-1) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.12 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]

- (a) The Permittee shall record the pressure drop across the dust collectors, cyclone and baghouse used in conjunction with EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3; and DCS-1 at least once per day when any of these facilities are in operation. When for any one reading, the pressure drop across either control device is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.13 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

D.1.14 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B -

Emergency Provisions).

Cyclone failure can be indicated by a significant drop in the cyclone's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

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

D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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 total VOC usage for each month.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) To document compliance with Condition D.1.11, the Permittee shall maintain records of visible emission notations of the EU4 and D2-MS1 stack exhausts (Stacks DC1-1 and 20.1) once per day.
- (e) To document compliance with Condition D.1.12, the Permittee shall maintain records once per day of the pressure drop during normal operation when venting to the atmosphere.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.17 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.1.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: SMC Operations subject to NESHAP WWWW

- (h) One (1) Sheet Molding Compound (SMC) Production Line, identified as SMC2, installed in 2000, capacity: 18,500 pounds of molding compound per hour, consisting of:
 - (1) Two (2) calcium carbonate silos, identified as SILO1 and SILO2, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour, each, capacity: 200,000 pounds of calcium carbonate, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (2) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (3) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (i) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (j) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (k) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (l) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (m) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (n) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (o) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (p) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (q) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (r) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered

a sheet molding compound (SMC) manufacturing operation.

Facility Description [326 IAC 2-7-5(15)]: SMC Operations subject to NESHAP WWWW (continued)

- (s) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (t) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 through 25, installed in 2005, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.

Insignificant Activities

- (l) Four (4) five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (m) Two (2) five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (n) Six (6) above ground resin storage tanks, identified as Tanks 1 through 6, exhausting through stack 17.1 and/or stack 17.2 capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (o) Five (5) resin holding tanks consisting of two (2) tanks, identified as A Side-Tank 1 and A Side-Tank 2 capacity: 1,500 gallons of resin each, and three (3) tanks, identified B Side-1 through B Side-3, capacity: 80 gallons of resin, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (p) One (1) 6,300 gallon tank storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.

(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.2.1 PSD Minor Limits [326 IAC 2-2]

- (a) Pursuant to SSM 033-21698-00019, issued October 31, 2005, and revised by this permit, the amount of VOC delivered to Presses 17 through 20, constructed in 2002, shall be limited to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The VOC emissions from Presses 17 through 20 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

This will limit VOC emissions from the four (4) SMC presses (Presses 17 through 20) to less than a total of forty (40) tons per year, and render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

- (b) Pursuant to SSM 033-20516-00019, issued April 23, 2005, the amount of VOC delivered to Presses 21 through 25, constructed in 2005, shall be limited to less than a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The VOC emissions from Presses 21 through 25 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

This will limit the VOC emissions from Presses 21 through 25, together with the projected increase in actual emissions from the upstream SMC machine, to less than a total of forty (40) tons per year of VOC, and will render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, the particulate emission rate from SILO1 and SILO2 shall not exceed 11.06 pounds per hour, each, when operating at a process weight rate of 8,800 pounds per hour (4.4 tons per hour), each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.2.3 Volatile Organic Compounds (VOC)

- (a) To determine compliance with Condition D.2.1(a), the amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 17 through 20 (lbs) = \sum SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

- (b) To determine compliance with Condition D.2.1(b), the amount of VOC delivered to Presses 21 through 25 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 21 through 25 (lbs) = \sum SMC throughput at Presses 21 through 25 (lbs) x the % VOC (Styrene) content of the SMC

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Condition D.2.2, the baghouses for particulate control shall be in operation and control emissions from SILO1 and SILO2 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the SILO1 and SILO2 stack exhausts (Stacks 25.2 and 25.3) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with SILO1 and SILO2 at least once per day when SILO1 or SILO2 is in operation. When for any one reading, the pressure drop across either baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1(a) and D.2.1(b), the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The total SMC throughput at Presses 17 through 20 and 21 through 25 each month; and
- (2) The VOC content of each SMC material used at Presses 17 through 20 and 21 through 25.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the SILO1 and SILO2 stack exhausts (Stacks 25.2 and 25.3) once per day.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records once per day of the pressure drop during normal operation when venting to the atmosphere.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(a) and D.2.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.10 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with the schedule in 40 CFR 63 Subpart WWWW.

D.2.11 NESHAP WWWW Requirements [40 CFR Part 63, Subpart WWWW]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780, as published in 70 FR 50124, August 25, 2005, with an effective date of October 24, 2005, for the Sheet Molding Compound (SMC) Production Line, identified as SMC2, the SMC presses (Presses 1 through 9 and 11 through 25), and equipment cleaning, cleaning of materials used in reinforced plastic composites manufacture, mixing, and HAP-containing material storage, with a compliance date of April 21, 2006, as specified as follows:

What This Subpart Covers

§ 63.5780 What is the purpose of this subpart?

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

§ 63.5785 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

§ 63.5790 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

§ 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

(a) A reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraphs (a)(1) and (2) of this section.

(1) You commence construction of the source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production source exists at that site.

(b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

§ 63.5797 How do I determine the organic HAP content of my resins and gel coats?

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

(a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

(b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total

organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

Compliance Dates and Standards

§ 63.5800 When do I have to comply with this subpart?

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting a organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

§ 63.5805 What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold.

(a) If you have an existing facility that has any centrifugal casting or continuous casting/lamination operations, you must meet the requirements of paragraph (a)(1) or (2) of this section:

(1) If the combination of all centrifugal casting and continuous lamination/casting operations emit 100 tpy or more of HAP, you must reduce the total organic HAP emissions from centrifugal casting and continuous lamination/casting operations by at least 95 percent by weight. As an alternative to meeting the 95 percent by weight requirement, centrifugal casting operations may meet the applicable organic HAP emissions limits in Table 5 to this subpart and continuous lamination/casting operations may meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied. For centrifugal casting, the percent reduction requirement does not apply to organic HAP emissions that occur during resin application onto an open centrifugal casting mold using open molding application techniques.

(2) If the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, then centrifugal casting and continuous lamination/casting operations must meet the appropriate requirements in Table 3 to this subpart.

(b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.

(g) If you have repair operations subject to this subpart as defined in §63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of this section.

General Compliance Requirements

§ 63.5835 What are my general requirements for complying with this subpart?

(a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

(c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

Testing and Initial Compliance Requirements

§ 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

§ 63.5860 How do I demonstrate initial compliance with the standards?

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of §63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

Continuous Compliance Requirements

§ 63.5900 How do I demonstrate continuous compliance with the standards?

(a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.

(c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

Notifications, Reports, and Records

§ 63.5905 What notifications must I submit and when?

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

§ 63.5910 What reports must I submit and when?

(a) You must submit each report in Table 14 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(d) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.

(i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

§ 63.5915 What records must I keep?

(a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

§ 63.5920 In what form and how long must I keep my records?

(a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Other Requirements and Information

§ 63.5925 What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

§ 63.5930 *Who implements and enforces this subpart?*

(a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the organic HAP emissions standards in §63.5805 under §63.6(g).

(2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.5935 *What definitions apply to this subpart?*

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Atomized mechanical application means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

Bulk molding compound (BMC) means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composites products.

BMC manufacturing means a process that involves the preparation of BMC.

Centrifugal casting means a process for fabricating cylindrical composites, such as pipes, in which composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces until the part is sufficiently cured to maintain its physical shape.

Charge means the amount of SMC or BMC that is placed into a compression or injection mold necessary to complete one mold cycle.

Cleaning means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

Clear production gel coat means an unpigmented, quick-setting resin used to improve the surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (e.g., compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

Composite means a shaped and cured part produced by using composite materials.

Composite materials means the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.

Compression molding means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

Compression/injection molding means a grouping of processes that involves the use of compression molding and/or injection molding.

Continuous casting means a continuous process for fabricating composites in which composite materials are placed on an in-line conveyor belt to produce cast sheets that are cured in an oven.

Continuous lamination means a continuous process for fabricating composites in which composite materials are typically sandwiched between plastic films, pulled through compaction rollers, and cured in an oven. This process is generally used to produce flat or corrugated products on an in-line conveyor.

Continuous lamination/casting means a grouping of processes that involves the use of continuous lamination and/or continuous casting.

Controlled emissions means those organic HAP emissions that are vented from a control device to the atmosphere.

Corrosion-resistant gel coat means a gel coat used on a product made with a corrosion-resistant resin that has a corrosion-resistant end-use application.

Corrosion-resistant end-use applications means applications where the product is manufactured specifically for an application that requires a level of chemical inertness or resistance to chemical attack above that required for typical reinforced plastic composites products. These applications include, but are not limited to, chemical processing and storage; pulp and paper production; sewer and wastewater treatment; power generation; potable water transfer and storage; food and drug processing; pollution or odor control; metals production and plating; semiconductor manufacturing; petroleum production, refining, and storage; mining; textile production; nuclear materials storage; swimming pools; and cosmetic production, as well as end-use applications that require high strength resins.

Corrosion-resistant industry standard includes the following standards: ASME RTP-1 or Sect. X; ASTM D5364, D3299, D4097, D2996, D2997, D3262, D3517, D3754, D3840, D4024, D4160, D4161, D4162, D4184, D3982, or D3839; ANSI/AWWA C950; UL 215, 1316 or 1746, IAPMO PS-199, or written customer requirements for resistance to specified chemical environments.

Corrosion-resistant product means a product made with a corrosion-resistant resin and is manufactured to a corrosion-resistant industry standard, or a food contact industry standard, or is manufactured for corrosion-resistant end-use applications involving continuous or temporary chemical exposures.

Corrosion-resistant resin means a resin that either:

(1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH \geq 12.0 or \leq 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or

(2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

Doctor box means the box or trough on an SMC machine into which the liquid resin paste is delivered before it is metered onto the carrier film.

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

Filled Resin means that fillers have been added to a resin such that the amount of inert substances is at least 10 percent by weight of the total resin plus filler mixture. Filler putty made from a resin is considered a filled resin.

Fillers means inert substances dispersed throughout a resin, such as calcium carbonate, alumina trihydrate, hydrous aluminum silicate, mica, feldspar, wollastonite, silica, and talc. Materials that are not considered to be fillers are glass fibers or any type of reinforcement and microspheres.

Fire retardant gel coat means a gel coat used for products for which low-flame spread/low-smoke resin is used.

Fluid impingement technology means a spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams.

Food contact industry standard means a standard related to food contact application contained in Food and Drug Administration's regulations at 21 CFR 177.2420.

Gel Coat means a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Gel coat application means a process where either clear production, pigmented production, white/off-white or tooling gel coat is applied.

HAP-containing materials storage means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

High Performance gel coat means a gel coat used on products for which National Sanitation Foundation, United States Department of Agriculture, ASTM, durability, or other property testing is required.

High strength gel coat means a gel coat applied to a product that requires high strength resin.

High strength resins means polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles.

Injection molding means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

Low Flame Spread/Low Smoke Products means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than to equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

Manual resin application means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

Mechanical resin application means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

Mixing means the blending or agitation of any HAP-containing materials in vessels that are 5.00 gallons (18.9 liters) or larger, and includes the mixing of putties or polyputties. Mixing may involve the blending of resin, gel coat, filler, reinforcement, pigments, catalysts, monomers, and any other additives.

Mold means a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

Neat gel coat means the resin as purchased for the supplier, but not including any inert fillers.

Neat gel coat plus means neat gel coat plus any organic HAP-containing materials that are added to the gel coat by the supplier or the facility, excluding catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

Neat resin means the resin as purchased from the supplier, but not including any inert fillers.

Neat resin plus means neat resin plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

Nonatomized mechanical application means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

Noncorrosion-resistant resin means any resin other than a corrosion-resistant resin or a tooling resin.

Noncorrosion-resistant product means any product other than a corrosion-resistant product or a mold.

Non-routine manufacture means that you manufacture parts to replace worn or damaged parts of a reinforced plastic composites product, or a product containing reinforced plastic composite parts, that was originally manufactured in another facility. For a part to qualify as non-routine manufacture, it must be used for repair or replacement, and the manufacturing schedule must be based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

Operation means a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.

Operation group means a grouping of individual operations based primarily on mold type. Examples are open molding, closed molding, and centrifugal casting.

Open molding means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

Pigmented gel coat means a gel coat that has a color, but does not contain 10 percent of more titanium dioxide by weight. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Polymer casting means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open, except for smoothing the material and/or vibrating the mold to remove bubbles. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.

Preform Injection means a form of pultrusion where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, is collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels, reservoirs, transfer systems, and collection systems are covered or shielded from the ambient air. Preform injection differs from direct die injection in that the injection chambers are not directly attached to the die.

Prepreg materials means reinforcing fabric received precoated with resin which is usually cured through the addition of heat.

Pultrusion means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a

shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

Repair means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

Resin transfer molding means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.

Sheet molding compound (SMC) means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners, mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

Shrinkage controlled resin means a resin that when promoted, catalyzed, and filled according to the resin manufacturer's recommendations demonstrates less than 0.3 percent linear shrinkage when tested according to ASTM D2566.

SMC manufacturing means a process which involves the preparation of SMC.

Tooling gel coat means a gel coat that is used to form the surface layer of molds. Tooling gel coats generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Tooling resin means a resin that is used to produce molds. Tooling resins generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Uncontrolled oven organic HAP emissions means those organic HAP emissions emitted from the oven through closed vent systems to the atmosphere and not to a control device. These organic HAP emissions do not include organic HAP emissions that may escape into the workplace through the opening of panels or doors on the ovens or other similar fugitive organic HAP emissions in the workplace.

Uncontrolled wet-out area organic HAP emissions means any or all of the following: Organic HAP emissions from wet-out areas that do not have any capture and control, organic HAP emissions that escape from wet-out area enclosures, and organic HAP emissions from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to an add-on control device.

Unfilled means that there has been no addition of fillers to a resin or that less than 10 percent of fillers by weight of the total resin plus filler mixture has been added.

Vapor suppressant means an additive, typically a wax, that migrates to the surface of the resin during curing and forms a barrier to seal in the styrene and reduce styrene emissions.

Vapor-suppressed resin means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

White and off-white gel coat means a gel coat that contains 10 percent of more titanium dioxide by weight.

Table 2 to Subpart WWWW of Part 63—Compliance Dates for New and Existing Reinforced Plastic Composites Facilities

As required in §§63.5800 and 63.5840 you must demonstrate compliance with the standards by the dates in the following table:

If your facility is . . .	And . . .	Then you must comply by this date . . .
1. An existing source.....	a. Is a major source on or before the publication date of this subpart.	i. April 21, 2006, or ii. You must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.

Table 4 to Subpart WWWW of Part 63—Work Practice Standards

As specified in §63.5805, you must meet the work practice standards in the following table that apply to you:

For . . .	You must . . .
1. a new or existing closed molding operation using compression/injection molding.	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation.	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation.	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation.	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations\1\.	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.

For . . .	You must . . .
7. all mixing or BMC manufacturing operations\1\.	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations\1\.	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
\1\ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.	

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards
As specified in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
1. a new or existing closed molding operation using compression/injection molding.	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment.	the owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application

Application
equipment
includes any
equipment that
directly contacts
resin between
storage and
applying resin to
the mold or
reinforcement.

equipment,
contain no HAP.

3. a new or existing materials
HAP-containing materials
storage operation.

keep containers
that store HAP-
containing
materials closed
or covered except
during the
addition or
removal of
materials. Bulk
HAP-containing
materials storage
tanks may be
vented as
necessary for
safety.

the owner or
operator submits
a certified
statement in the
notice of
compliance status
that all HAP-
containing
storage
containers are
kept closed or
covered except
when adding or
removing
materials, and
that any bulk
storage tanks are
vented only as
necessary for
safety.

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
4. an existing or new SMC manufacturing operation.	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.	the owner or operator submits a certified statement in the notice of compliance status that the resin delivery system is closed or covered.
5. an existing or new SMC manufacturing operation.	use a nylon containing film to enclose SMC.	the owner or operator submits a certified statement in the notice of compliance status that a nylon-containing film is used to enclose SMC.
6. an existing or new mixing or BMC manufacturing operation.	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
7. an existing mixing or BMC manufacturing operation.	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety.	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation.	keep the mixer covers closed during mixing except when adding materials to the mixing vessels.	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications

As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).

Table 14 to Subpart WWWW of Part 63—Requirements for Reports
 As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report.....	<p>a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in § 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period.</p> <p>b. The information in § 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the information in § 63.5910(e).</p>	<p>Semiannually according to the requirements in § 63.5910(b).</p> <p>Semiannually according to the requirements in § 63.5910(b).</p>

You must submit a(n)	The report must contain . . .	You must submit the report . . .
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.	c. The information in § 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan. a. Actions taken for the event. b. The information in § 63.10(d)(5)(ii).	Semiannually according to the requirements in § 63.5910(b). By fax or telephone within 2 working days after starting actions inconsistent with the plan. By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§ 63.10(d)(5)(ii)).

D.2.12 One Time Deadlines Relating to NESHAP WWWW

- (a) The Permittee must conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
- (b) A notification of compliance status shall be submitted as follows:
 - (1) If complying with organic HAP emissions limit average provisions, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2007.
 - (2) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limits other than organic HAP emissions limit averaging, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2006.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking. [326 IAC 6-3-2]
- (r) Activities with particulate emissions less than 5 lbs/hour or 25 lbs/day:
 - (2) Three (3) fiberglass skin cut down saws (FS-1, FS-2 and FS-3) [326 IAC 6-3-2].
 - (3) One (1) sanding booth (FS-4) [326 IAC 6-3-2].

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120OF)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant grinding and machining operations, including FS-1, FS-2, FS-3 and FS-4, shall not exceed an amount determined by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

P = process weight rate in tons per hour

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (U) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

(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.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the deflashing station (DF-1) shall not exceed 14.87 pounds per hour when operating at a process weight rate of 13,680 pounds per hour (6.84 tons per hour). The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Minor Source Modification (PM and PM₁₀) [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), the potential to emit of the deflashing station (DF-1) shall be limited to less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM₁₀ by using a particulate air pollution control device as follows:

- (a) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (b) Complying with a no visible emission standard.
- (c) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.
- (d) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).

Compliance Determination Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.4.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.4.1 and D.4.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation.
- (b) In the event that cartridge failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.4.4 Visible Emissions Notations

- (a) Visible emission notations of the deflashing station (DF-1) exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.4.5 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the cartridges used in conjunction with the deflashing station (DF-1) at least once per day when the deflashing station (DF-1) is in operation. When for any one reading, the pressure drop across the cartridge is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.6 Broken or Failed Cartridge Detection

- (a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

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

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.2, the Permittee shall maintain the following records:
 - (1) Copies of manufacturer specifications for the control device that indicate control efficiency equal to or greater than ninety-nine percent (99%) efficiency.
 - (2) Records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere, or maintain a record of the reason why the visible emission notations were not taken.
 - (3) A record of the calculations to show that the uncontrolled potential PM and PM₁₀ emissions are less than two hundred fifty (250) tons per year, each.
 - (4) A copy of the vendor certification that guarantees that actual emissions will be less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere, or maintain a record of the reason why the visible emission notations were not taken.
- (c) To document compliance with Condition D.4.5, the Permittee shall maintain records once per day of the pressure drop.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-17546-00019

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 BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-17546-00019

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and<input type="checkbox"/> 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.
--

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-17546-00019
Facility: EU3
Parameter: Total use of VOC, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 74.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
 Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Part 70 Permit No.: T 033-17546-00019
 Facilities: Presses 17 through 20
 Parameter: Amount of VOC Delivered
 Limit: Less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC delivered shall be determined using the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 17 through 20 (lbs)} = \sum \text{SMC throughput at Presses 17 through 20 (lbs)} \times \text{the \% VOC (Styrene) content of the SMC}$$

YEAR: _____

Month	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
 Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Part 70 Permit No.: T 033-17546-00019
 Facilities: Presses 21 through 25
 Parameter: Amount of VOC Delivered
 Limit: Less than a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC delivered shall be determined using the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 21 through 25 (lbs)} = \sum \text{SMC throughput at Presses 21 through 25 (lbs)} \times \text{the \% VOC (Styrene) content of the SMC}$$

YEAR: _____

Month	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Therma Tru Corporation
 Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Part 70 Permit No.: T 033-17546-00019

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Name: Therma Tru Corporation
Source Location: 108 Mutzfeld Road, Butler, Indiana 46721
County: DeKalb
SIC Code: 3089 and 3442
Operation Permit No.: T 033-17546-00019
Permit Reviewer: Edward A. Longenberger

On November 17, 2006, the Office of Air Quality (OAQ) had a notice published in the Evening Star, Auburn, Indiana, stating that Therma Tru Corporation had applied for a Part 70 Operating Permit Renewal to continue to operate a metal and fiberglass entry door manufacturing source with dry filters, cyclones and bag-houses for particulate control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit Renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

During processing of this Part 70 Operating Permit Renewal, a Minor Source Modification (MSM 033-23835-00019) and Minor Permit Modification (MPM 033-23875-00019) were issued to permit the construction and operation of a deflashing station (DF-1). This machine is used to remove excess fiberglass from around the edges of molded door skins.

Since the Minor Permit Modification has satisfied the public notice requirements, the operating conditions for the new deflashing station can be included in the Part 70 Operating Permit Renewal at this time. Therefore, the corresponding changes have been made to Section A.2, and Section D.4 has been added. Also, an addendum to Appendix A of the TSD has been included. This spreadsheet shows the potential emission calculations for DF-1, and will satisfy the requirements of Condition D.4.7(a)(3). The changes to the permit are as follows:

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:

- (u) **One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.**

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (u) **One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.**

(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.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the deflashing station (DF-1) shall not exceed 14.87 pounds per hour when operating at a process weight rate of 13,680 pounds per hour (6.84 tons per hour). The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Minor Source Modification (PM and PM₁₀) [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), the potential to emit of the deflashing station (DF-1) shall be limited to less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM₁₀ by using a particulate air pollution control device as follows:

- (a) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (b) Complying with a no visible emission standard.
- (c) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.
- (d) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).

Compliance Determination Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.4.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.4.1 and D.4.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation.
- (b) In the event that cartridge failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.4.4 Visible Emissions Notations

- (a) Visible emission notations of the deflashing station (DF-1) exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.4.5 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the cartridges used in conjunction with the deflashing station (DF-1) at least once per day when the deflashing station (DF-1) is in operation. When for any one reading, the pressure drop across the cartridge is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.6 Broken or Failed Cartridge Detection

- (a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

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

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.2, the Permittee shall maintain the following records:
- (1) Copies of manufacturer specifications for the control device that indicate control efficiency equal to or greater than ninety-nine percent (99%) efficiency.
 - (2) Records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere, or maintain a record of the reason why the visible emission notations were not taken.
 - (3) A record of the calculations to show that the uncontrolled potential PM and PM₁₀ emissions are less than two hundred fifty (250) tons per year, each.
 - (4) A copy of the vendor certification that guarantees that actual emissions will be less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere, or maintain a record of the reason why the visible emission notations were not taken.
- (c) To document compliance with Condition D.4.5, the Permittee shall maintain records once per day of the pressure drop.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 2:

In order to reduce the need for administrative changes to permits, the IDEM, OAQ has decided to no longer list the name or title of the responsible official in operating permits. Therefore, the following change has been made to Condition A.1:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a metal and fiberglass entry door manufacturing source.

Responsible Official:	_____ Plant Manager
Source Address:	108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address:	108 Mutzfeld Road, Butler, Indiana 46721
General Source Phone Number:	260 - 868 - 5811
SIC Code:	3089 and 3442
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules

Change 3:

Condition C.18 - General Record Keeping Requirements has been amended as shown to more clearly explain when the Permittee might utilize the projected actual emissions to determine whether the modification is major under 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset):

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (c) If there is a ~~reasonable possibility that~~ a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, ~~other than projects at a Clean Unit,~~ which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) ~~may result in significant emissions increase~~ and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

Change 4:

The following changes to Condition D.2.1 have been made to clarify that the intent of the limits is to ensure that previous modifications were minor modifications under 326 IAC 2-2:

D.2.1 PSD Minor Limits ~~Volatile Organic Compounds (VOC)~~ [326 IAC 2-2]

~~In order to render requirements of 326 IAC 2-2 not applicable:~~

- (a) Pursuant to SSM 033-21698-00019, issued October 31, 2005, **and revised by this permit,** the amount of VOC delivered to Presses 17 through 20, **constructed in 2002,** shall be limited to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

~~The amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:~~

~~Amount of VOC delivered to Presses 17 through 20 (lbs) = \sum SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC~~

The VOC emissions from Presses 17 through 20 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

This will limit VOC emissions from the four (4) SMC presses (Presses 17 through 20) to less than a total of forty (40) tons per year, and render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

- (b) Pursuant to SSM 033-20516-00019, issued April 23, 2005, the amount of VOC delivered to Presses 21 through 25, **constructed in 2005,** shall be limited to less than a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

~~The amount of VOC delivered to Presses 21 through 25 shall be determined by the following equation for each type of SMC material used:~~

~~Amount of VOC delivered to Presses 21 through 25 (lbs) = \sum SMC throughput at Presses 21 through 25 (lbs) x the % VOC (Styrene) content of the SMC~~

- (~~e~~) The VOC emissions from Presses ~~17~~ **21** through 25 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

This will limit the VOC emissions from Presses 21 through 25, together with the projected increase in actual emissions from the upstream SMC machine, to less than a total of forty (40) tons per year of VOC, and will render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

Note: The flash off emission factor of 0.030 pounds of VOC emitted per pound of VOC contained in the SMC is based on the AP-42 emission factor for closed molding.

Change 5:

The following changes to Condition D.2.3 have been made to clarify how the Permittee shall determine compliance with the PSD minor limits in Condition D.2.1:

D.2.3 Volatile Organic Compounds (VOC) ~~[326 IAC 8-1-4] [326 IAC 8-1-2(a)]~~

~~Compliance with the VOC content and usage limitations contained in Condition D.2.1 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 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.~~

- (a) **To determine compliance with Condition D.2.1(a), the amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:**

Amount of VOC delivered to Presses 17 through 20 (lbs) = \sum SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

- (b) **To determine compliance with Condition D.2.1(b), the amount of VOC delivered to Presses 21 through 25 shall be determined by the following equation for each type of SMC material used:**

Amount of VOC delivered to Presses 21 through 25 (lbs) = \sum SMC throughput at Presses 21 through 25 (lbs) x the % VOC (Styrene) content of the SMC

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

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

Source Background and Description

Source Name:	Therma Tru Corporation
Source Location:	108 Mutzfeld Road, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3089 and 3442
Operation Permit No.:	T 033-7927-00019
Operation Permit Issuance Date:	November 12, 1998
Permit Renewal No.:	T 033-17546-00019
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Therma Tru Corporation relating to the operation of a metal and fiberglass entry door manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One door skin gluing operation, identified as EU2, installed in 1989, equipped with dry filters, exhausting to Stack 1.1, capacity: 360 doors per hour.
- (b) One (1) flowcoating operation, identified as EU3, replaced in 2000, consisting of one (1) flowcoater, equipped with filters, one (1) flash off tunnel and one (1) paint cure oven, and exhausting to Stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4, respectively, capacity: 360 metal doors per hour.
- (c) One (1) machining station, identified as EU4, installed in 1989, using a dust collector (DC1) for particulate emission control and exhausting to Stack DC1-1, capacity: 360 doors per hour and 16,200 pounds per hour, consisting of the following:
 - (1) MJ machining center (EU4-1).
 - (2) Online boring (EU4-2).
 - (3) Single end rail boring machine (EU4-3), with a capacity of 240 end rails per hour.
- (d) One (1) Door Assembly Line, installed in 2000, capacity: 20,250 pounds of doors per hour or 360 doors per hour, consisting of:
 - (1) One (1) adhesive application station, identified as D2-APP1, equipped with dry filters, exhausting through Stack 18.2, capacity: 43 pounds of adhesive per hour or 360 doors per hour.
 - (2) One (1) electric glue curing oven, identified as D2-OV2, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity: 360 doors per hour.
 - (3) One (1) door foam injection system, identified as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 360 doors per hour.

- (4) One (1) door machining station, identified as D2-MS1, including an online boring center (D2-MS1-1), equipped with a baghouse and cyclone connected in series, identified as DC2, exhausting through Stack 20.1, capacity: 360 doors per hour or 18,000 pounds per hour.
- (e) Machining centers connected to dust collector DC3 and exhausting to stack DC3-1, as follows:
 - (1) Two (2) CNC Thermwood machining centers for Patio Doors, identified as PA-1, installed in 2006, capacity: 11.25 patio door units per hour, each.
 - (2) Three (3) KVAL cutout machines, identified as CO-1, CO-2 and CO-3, installed in 1993, 2005 and 2000, respectively, capacity: 50 units per hour, each.
 - (3) One (1) Door Hinger, identified as DH-1, installed prior to 1991, capacity: 15.63 doors per hour.
- (f) One (1) double cut saw, identified as DCS-1, installed in 2004, equipped with a Torit downflo baghouse and exhausting indoors, capacity: 130 door skins per hour.
- (g) One (1) concrete door adhesive spraying operation, identified as CD-2, installed in 2005, equipped with dry filters and exhausting indoors, capacity: 48 units per hour.
- (h) One (1) Sheet Molding Compound (SMC) Production Line, identified as SMC2, installed in 2000, capacity: 18,500 pounds of molding compound per hour, consisting of:
 - (1) Two (2) calcium carbonate silos, identified as SILO1 and SILO2, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour, each, capacity: 200,000 pounds of calcium carbonate, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (2) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (3) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (i) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (j) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (k) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63

(NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.

- (l) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (m) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (n) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (o) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (p) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (q) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (r) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (s) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (t) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 through 25, installed in 2005, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no proposed emission units during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, 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) Btu per hour. Total maximum heat input rating: 111.50 million British thermal units per hour:
 - (1) Four (4) heating units, HV-1101 through HV-1104, rated at 9.625 million British thermal units per hour, each.
 - (2) Four (4) makeup air units, identified HV-1105 through HV-1108, rated at 0.529 million British thermal units per hour, each.
 - (3) One (1) air curtain, identified DA-1101, rated at 0.350 million British thermal units per hour.
 - (4) One (1) York unit, identified HVAC-101, rated at 0.080 million British thermal units per hour.
 - (5) One (1) Sterling Unit, identified HVAC-102m rated at 0.179 million British thermal units per hour.
 - (6) Two (2) space heaters, identified HV-2101 and HV-2102, rated at 9.625 million British thermal units per hour, each.
 - (7) One (1) air curtain, identified as DA-2101, rated at 0.350 million British thermal units per hour.
 - (8) Six (6) heating/cooling units, identified as RTU-1-A through RTU-1-F, rated at 0.22161 million British thermal units per hour, each.
 - (9) Three (3) heating/cooling units, identified as TRU-3-A through RTU-3-C, rated at 0.27009 million British thermal units per hour, each.
 - (10) Two (2) heating/cooling units, identified as RTU-4-A and RTU-4-B, rated at 0.06744 million British thermal units per hour, each.
 - (11) Six (6) space heaters, known as M-MAU-1 and M-MAU-2, rated at 8.80 million British thermal units per hour, each, and M-MAU-3 through M-MAU-6, rated at 0.550 million British thermal units per hour, each.
 - (12) Seven (7) space heaters, known as D-MAU-1 through D-MAU-3, rated at 8.80 million British thermal units per hour, each, and D-MAU-4 through D-MAU-7, rated at 0.550 million British thermal units per hour, each.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking. [326 IAC 6-3-2]
- (h) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (j) Three foam presses with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (k) Activities with VOC emissions equal to or less than 3 pounds per hour or 15 pounds per day: One (1) quality check (QC) spray booth, using aerosol spray cans, equipped with dry filters and exhausting to Stack QC-1, capacity: one (1) ten-ounce can of paint per hour.
- (l) Four (4) five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (m) Two (2) five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (n) Six (6) above ground resin storage tanks, identified as Tanks 1 through 6, exhausting through stack 17.1 and/or stack 17.2 capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (o) Five (5) resin holding tanks consisting of two (2) tanks, identified as A Side-Tank 1 and A Side-Tank 2 capacity: 1,500 gallons of resin each, and three (3) tanks, identified B Side-1 through B Side-3, capacity: 80 gallons of resin, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.
- (p) One (1) 6,300 gallon tank storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered HAP-containing materials storage.

- (q) One (1) Acetone distiller unit capable of distilling 5 gallons of used Acetone in 8 hours with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day.
- (r) Activities with particulate emissions less than 5 lbs/hour or 25 lbs/day:
 - (1) One (1) concrete mixing operation for fire doors (CD-1).
 - (2) Three (3) fiberglass skin cut down saws (FS-1, FS-2 and FS-3) [326 IAC 6-3-2].
 - (3) One (1) sanding booth (FS-4) [326 IAC 6-3-2].

Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T 033-7927-00019, issued on November 12, 1998, and the following amendments and modifications:

- (a) SSM 033-10998-00019, issued January 21, 2000
- (b) SPM 033-11605-00019, issued January 28, 2000
- (c) SPM 033-11940-00019, issued June 2, 2000
- (d) SSM 033-12630-00019, issued December 5, 2000
- (e) AAT 033-12746-00019, issued December 8, 2000
- (f) MSM 033-14449-00019, issued July 30, 2001
- (g) Reopening 033-13182-00019, issued December 31, 2001
- (h) AAT 033-16180-00019, issued November 14, 2002
- (i) SSM 033-20516-00019, issued April 23, 2005
- (j) SPM 033-20777-00019, issued May 2, 2005
- (k) SSM 033-21698-00019, issued October 31, 2005
- (l) SPM 033-21597-00019, issued November 15, 2005

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 proposed permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this proposed Part 70 Operating Permit:

- (a) Condition D.1.4, which limited the PM and PM₁₀ emissions from the flowcoater (EU3) to less than 1.19 pounds per hour.

Reason not incorporated: This limitation is unnecessary because a flowcoating operation is considered to have zero particulate emissions.

- (b) Condition D.5.2(a), which limited the particulate emissions from the sheet molding compound (SMC) production line to less than 18.2 pounds per hour, pursuant to 326 IAC 6-3-2.

Reason not incorporated: This single limitation is unnecessary because the individual emission units which comprise the SMC production line and produce particulate emissions are limited by the requirements of 326 IAC 6-3. Each unit in this production line is considered a facility because each unit can operate independently and can produce intermediate or final product.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 administratively complete Part 70 Operating Permit renewal application for the purposes of this review was received on February 7, 2003. Additional information was received on June 6, 2005, August 30, 2006, and September 21 and 22, 2006.

Emission Calculations

See pages 1 through 8 of Appendix A of this document for detailed emission calculations.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

The source was issued a Part 70 Operating Permit on November 12, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit 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 (tons/yr)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Door Skin Gluing (EU2)	2.27	2.27	-	3.69	-	-	3.69
Flowcoating (EU3)	-	-	-	Limited to 74.8	-	-	1.17
Machining (EU4)							
EU4-1	5.06	5.06	-	-	-	-	-
EU4-2	7.88	7.88	-	-	-	-	-

Process/Emission Unit	Potential To Emit (tons/yr)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
EU4-3	0.420	0.420	-	-	-	-	-
Door Assembly Line (2000)							
D2-APP1	14.02	14.02	-	22.79	-	-	22.78
D2-MS1	11.13	11.13	-	-	-	-	-
D2-MS1-1	7.88	7.88					
SMC2 (2000)							
SILO1	0.751	0.751	-	-	-	-	-
SILO2	0.751	0.751	-	-	-	-	-
Resin Mixers	-	-	-	7.70	-	-	7.70
SMC Extruder	-	-	-	12.2	-	-	12.2
SMC Presses							
SMC Presses 1 through 8 (1989)	-	-	-	122	-	-	122
SMC Press 9 (1999)	-	-	-	13.6	-	-	13.6
SMC Presses 11 through 14 (2000)	-	-	-	61.1	-	-	61.1
SMC Presses 15 and 16 (2001)	-	-	-	30.6	-	-	30.6
SMC Presses 17 through 20 (2002)	-	-	-	Less than 40.0	-	-	Less than 40.0
SMC Presses 21 through 25 (2005)	-	-	-	Less than 37.68	-	-	Less than 37.68
Machining activities formerly listed under insignificant activities							
PA-1	0.296	0.296	-	-	-	-	-
CO-1, CO-2 and CO-3	6.44	6.44	-	-	-	-	-
DH-1	0.219	0.219	-	-	-	-	-
DCS-1	2.81	2.81	-	-	-	-	-
CD-2	2.88	2.88	-	2.01	-	-	-
Insignificant Activities	10.0	10.0	0.293	10.0	41.0	48.8	0.922
Total Emissions	72.8	72.8	0.293	438	41.0	48.8	353

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are each equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) 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.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM ₁₀	0
SO ₂	0
VOC	44
CO	1
NO _x	1
HAP	Not reported

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

- (b) DeKalb County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) DeKalb County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

Part 70 Operating Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet 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 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for VOC (EU3), and is subject to an emission limitation or standard for that pollutant. However, the emission unit does not use a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in the permit for EU3.

- (b) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for particulate:

- (1) with the potential to emit before controls equal to or greater than the major source threshold for PM_{10} ,
- (2) that is subject to an emission limitation or standard for particulate, and
- (3) uses a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this source. The emissions units subject to 40 CFR 64 include D2-APP1, EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3; and DCS-1. The CAM Plans include the following:

- (1) For the surface coating operations (D2-APP1):
 - (A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack 18.2) 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 reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (B) Monthly inspections shall be performed of the coating emissions from the stacks 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 in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (2) For the machining operations (EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3; and DCS-1):

The Permittee shall record the pressure drop across the dust collectors used in conjunction with EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3; and DCS-1, at least once per day when any of the associated facilities are in operation. When for any one reading, the pressure drop across the control device is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) All storage tanks at this source have a capacity less than 75 cubic meters. Therefore, the requirements of 40 CFR 60, Subpart Kb are not included in the permit.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, are not included in this permit for any of the natural gas-fired combustion units. The natural gas-fired combustion units are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because they have a rated capacity of less than or equal to ten (10) million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for affected sources in the small gaseous fuel subcategory.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) are not included in this permit for the insignificant degreasing operations, because no halogenated HAP solvents are used.
- (g) This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Therefore, this source is subject to the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63.5780, Subpart WWWW, with a compliance date of April 21, 2006.

Amendments to this subpart were final on August 25, 2005, and effective on October 24, 2005. However, 326 IAC 20-56 still references the previous version of the rule, from 68 FR 19402, April 21, 2003. Therefore, pursuant to 326 IAC 20-56, the Permittee must comply with the previous version of the rule, and pursuant to 40 CFR 63, Subpart WWWW, the Permittee must comply with the current version of the rule.

The portions of Subpart WWWW to which this source is subject were not substantially changed by the amendments. Therefore, compliance with the latest version of 40 CFR 63, Subpart WWWW, shall satisfy 326 IAC 20-56.

Construction of this source commenced prior to August 2, 2001. Therefore, this is an existing affected source. The affected source consists of all parts of the facility engaged in the following operations: closed molding, sheet molding compound (SMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts this source also manufactures. The specific facilities include the following:

- (1) One (1) Sheet Molding Compound (SMC) Production Line, identified as SMC2, installed in 2000, capacity: 18,500 pounds of molding compound per hour, consisting of:
 - (A) Two (2) calcium carbonate silos, identified as SILO1 and SILO2, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour, each, capacity: 200,000 pounds of calcium carbonate, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
 - (B) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.

- (C) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (2) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (3) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (4) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (5) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (6) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.
- (7) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (8) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (9) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (10) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (11) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.

- (12) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, this unit is considered a sheet molding compound (SMC) manufacturing operation.
- (13) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 through 25, installed in 2005, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour. Under 40 CFR 63 (NESHAP), Subpart WWWW, these units are considered sheet molding compound (SMC) manufacturing operations.

Insignificant Activities

- (14) Four (4) five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (15) Two (2) five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (16) Six (6) above ground resin storage tanks, identified as Tanks 1 through 6, exhausting through stack 17.1 and/or stack 17.2 capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day.
- (17) Five (5) resin holding tanks consisting of two (2) tanks, identified as A Side-Tank 1 and A Side-Tank 2 capacity: 1,500 gallons of resin each, and three (3) tanks, identified B Side-1 through B Side-3, capacity: 80 gallons of resin, each.
- (18) One (1) 6,300 gallon tank storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart WWWW:

- (1) 63.5780
- (2) 63.5785 (a)
- (3) 63.5790 (a), (b) and (c)
- (4) 63.5795 (a)(1) and (2), (b)
- (5) 63.5797 (a), (b) and (c)
- (6) 63.5800
- (7) 63.5805 (a), (b) and (g)
- (8) 63.5835 (a) and (c)
- (9) 63.5840
- (10) 63.5860 (a)
- (11) 63.5900 (a)(4), (b) and (c)
- (12) 63.5905

- (13) 63.5910 (a), (b), (c)(1) through (c)(5), (d), (g), (h) and (i)
- (14) 63.5915 (a) and (d)
- (15) 63.5920
- (16) 63.5925
- (17) 63.5930
- (18) 63.5935

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart WWWW.

- (h) The one door skin gluing operation, identified as EU2, and the one (1) adhesive application station, identified as D2-APP1, are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. This source is considered an existing affected source pursuant to 40 CFR 63.4482.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart PPPP.

This rule has a future compliance date (April 19, 2007), therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in this operating permit. The Permittee shall submit an application for a significant permit modification that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. This application must be submitted by July 19, 2006, which is nine months prior to the compliance date for the MACT. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was issued SSM 033-10998-00019 on January 21, 2000. Prior to this modification, this source was an existing minor source under 326 IAC 2-2 (PSD). The PM and PM₁₀ emissions from the existing source were 242.2 tons per year. The construction of the door assembly line, the SMC production line and some insignificant activities added 64.1 and 65.3 tons of PM and PM₁₀, respectively. This modification was a minor modification to an existing minor source. The modification caused the total PM and PM₁₀ emissions from the source to exceed two hundred fifty (250) tons per year, therefore, the source became a major source under 326 IAC 2-2.

- (a) Pursuant to SSM 033-12630-00019, issued December 5, 2000, the VOC emissions from EU3 shall be limited to less than 74.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limits the VOC increase from the replacement of EU3 to less than forty (40) tons per year, in order to ensure that the modification was a minor modification under 326 IAC 2-2.

- (b) Pursuant to SSM 033-21698-00019, issued October 31, 2005, the amount of VOC delivered to Presses 17 through 20 shall be limited to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 17 through 20 (lbs)} = \text{Total SMC throughput at Presses 17 through 20 (lbs)} \times \text{the \% VOC (Styrene) content of the SMC}$$

This will limit the VOC emissions from the four (4) SMC presses (Presses 17 through 20) to less than a total of forty (40) tons per year of VOC, based on an emission rate of 0.030 pounds of VOC emitted per pound of VOC contained in the SMC, in order to ensure that the modification was a minor modification under 326 IAC 2-2.

- (c) Pursuant to SSM 033-20516-00019, issued April 23, 2005, the amount of VOC delivered to Presses 21 through 25 shall be limited to less than a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 21 through 25 shall be determined by the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 21 through 25 (lbs)} = \text{Total SMC throughput at Presses 21 through 25 (lbs)} \times \text{the \% VOC (Styrene) content of the SMC}$$

This will limit the VOC emissions from the five (5) sheet molding compound (SMC) presses (Presses 21 through 25) to less than a total of 37.68 tons per year of VOC, based on an emission rate of 0.030 pounds of VOC emitted per pound of VOC contained in the SMC, in order to ensure that the modification was a minor modification under 326 IAC 2-2.

326 IAC 2-4.1-1 (New source toxics control)

Pursuant to 326 IAC 2-4.1-1(b)(2), a major source specifically regulated, or exempted from regulation, by a standard issued pursuant to Sections 112(d), 112(h), or 112(j) of the CAA is not subject to the requirements of 326 IAC 2-4.1.

Since the Sheet Molding Compound Production Line (SMC2) and the SMC presses (Presses 1 through 9 and 11 through 25) are subject to the requirements of 40 CFR 63, Subpart WWWW (which is a Section 112(j) MACT) as part of the existing source, the requirements of 326 IAC 2-4.1 do not apply to these facilities.

Since the one (1) adhesive application station (D2-APP1), are subject to the requirements of 40 CFR 63, Subpart PPPP (which is a Section 112(j) MACT) as part of the existing source, the requirements of 326 IAC 2-4.1 do not apply to these facilities.

All remaining facilities at this source have unrestricted potential emissions less than ten (10) tons per year of any single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.

Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source 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). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source does not have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 6-5 do not apply.

326 IAC 20-56 (Reinforced Plastic Composites Production)

This source is subject to the requirements of 326 IAC 20-56 (Reinforced Plastic Composites Production), since this source is a major source which existed prior to August 2, 2001. Therefore, pursuant to 326 IAC 20-25-1(d), this source is exempt from the requirements of 326 IAC 20-25.

State Rule Applicability – Individual Facilities

326 IAC 4-2 (Incinerators)

The natural gas-fired ovens at this source are not incinerators as defined in 326 IAC 1-2-34. The ovens are used to cure paints or adhesives. Therefore, this rule does not apply.

326 IAC 6-3-2(d) (Particulate emission limitations, work practices and control technologies)

- (a) Pursuant to 326 IAC 6-3-2(d), a dry particulate filter, waterwash, or an equivalent control device shall be operated in accordance with manufacturer's specifications and control emissions from the one door skin gluing operation (EU2), the one (1) adhesive application station (D2-APP1) and the one (1) concrete door adhesive spraying operation (CD-2) at all times when EU2, D2-APP1 or CD-2 are in operation.
- (b) Pursuant 326 IAC 6-3-1(b)(7), the one (1) flowcoating operation (EU3) is exempt from the requirements of 326 IAC 6-3.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the machining station (EU4-1, EU4-2 and EU4-3) shall not exceed 16.65 pounds per hour, when operating at a process weight rate of 16,200 pounds per hour (8.1 tons per hour).

According to Appendix A, the potential particulate emissions after control from the machining station are 3.05 pounds per hour. Therefore, the machining station can comply with this limit. The dust collector (DC1) shall be in operation at all times the machining station (EU4-1, EU4-2 and EU4-3) is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the door machining station (D2-MS1 and D2-MS1-1) shall not exceed 17.87 pounds per hour, when operating at a process weight rate of 18,000 pounds per hour (9.0 tons per hour).

According to Appendix A, the potential particulate emissions after control from the door machining station are 4.34 pounds per hour. Therefore, the door machining station can comply with this limit. The baghouse and cyclone (DC2) shall be in operation at all times the door machining station (D2-MS1 and D2-MS1-1) is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the two (2) CNC Thermwood machining centers (PA-1) shall not exceed 2.15 pounds per hour, each, when operating at a process weight rate of 765 pounds per hour (0.38 tons per hour), each.

According to Appendix A, the potential particulate emissions after control from each machining center are 0.034 pounds per hour. Therefore, the CNC Thermwood machining centers can comply with this limit. The dust collector (DC3) shall be in operation at all times either of the CNC Thermwood machining centers are in operation, in order to comply with this limit.

- (d) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the three (3) KVAL cutout machines (CO-1, CO-2 and CO-3) shall not exceed 4.70 pounds per hour, each, when operating at a process weight rate of 2,450 pounds per hour (1.225 tons per hour), each.

According to Appendix A, the potential particulate emissions after control from each KVAL cutout machine are 0.490 pounds per hour. Therefore, the three (3) KVAL cutout machines (CO-1, CO-2 and CO-3) can comply with this limit. The dust collector (DC3) shall be in operation at all times any of the three (3) KVAL cutout machines (CO-1, CO-2 and CO-3) are in operation, in order to comply with this limit.

- (e) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the one (1) Door Hinger (DH-1) shall not exceed 2.03 pounds per hour, when operating at a process weight rate of 703 pounds per hour (0.352 tons per hour).

According to Appendix A, the potential particulate emissions after control from the one (1) Door Hinger (DH-1) are 0.05 pounds per hour. Therefore, the one (1) Door Hinger (DH-1) can comply with this limit. The dust collector (DC3) shall be in operation at all times the one (1) Door Hinger (DH-1) is in operation, in order to comply with this limit.

- (f) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the one (1) double cut saw (DCS-1) shall not exceed 4.72 pounds per hour, when operating at a process weight rate of 2,470 pounds per hour (1.235 tons per hour).

According to Appendix A, the potential particulate emissions after control from the one (1) double cut saw (DCS-1) are 0.642 pounds per hour. Therefore, the one (1) double cut saw (DCS-1) can comply with this limit. The dust collector (DC3) shall be in operation at all times the one (1) double cut saw (DCS-1) is in operation, in order to comply with this limit.

- (g) Pursuant to 326 IAC 6-3-2, the particulate emission rate from SILO1 and SILO2 shall not exceed 11.06 pounds per hour, each, when operating at a process weight rate of 8,800 pounds per hour (4.4 tons per hour), each.

According to Appendix A, the potential particulate emissions after control from each silo are 0.171 pounds per hour. Therefore, the silos can comply with this limit. The bag-house shall be in operation at all times SILO1 or SILO2 is in operation, in order to comply with this limit.

These pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 8-1-6 (New facilities; general reduction requirements)

- (a) The unrestricted potential to emit VOC from the door skin gluing operation (EU2) is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to EU2.
- (b) The unrestricted potential to emit VOC from each of the SMC presses is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these presses.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The door assembly line adhesive application station, known as D2-APP1, applies adhesives to metal and fiberglass door skins. Since this facility emits more than fifteen (15) pounds of VOC per day, pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators when coating metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the adhesive application station is in compliance with this requirement.

- (b) The flowcoating operation (EU3) performs surface coating on metal doors, has a SIC code of 3442 and emits more than 15 lbs of VOC per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the flow coating operation (EU3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the flowcoating operation (EU3) is in compliance with this requirement.

- (c) The door skin gluing operation (EU2) commenced operation in 1989 and has potential VOC emissions less than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-9 will not apply.
- (d) The concrete door adhesive spraying operation (CD-2) has potential VOC emissions less than fifteen (15) pounds of VOC per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 will not apply.

326 IAC 20-56-1 (Reinforced Plastic Composites Production)

This rule incorporates by reference the previous version of 40 CFR 63, Subpart WWWW, from 68 FR 19402, April 21, 2003. The requirements of this rule are the same for this source as the requirements of the current version of the rule, applicable pursuant to 40 CFR 63.5780, except for the following:

- (a) 40 CFR 63.5810;
- (b) 40 CFR 63.5895(d); and
- (c) Tables 1, 3 and 7.

There are no open molding or centrifugal casting operations at this source. Thus, the requirements contained in the above sections of the NESHAP are not included in the permit. Compliance with the requirements as contained in the current version of the federal rule shall satisfy 326 IAC 20-25.

326 IAC 20-56-2 (Reinforced Plastic Composites Production)

There are no resin or gel coat spraying operations at this source, therefore, the operator training requirements of 326 IAC 20-56-2 are not included in this permit.

State Rule Applicability – Insignificant Activities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

None of the combustion facilities at this source are boilers or other types of indirect heating units. Therefore, the requirements of 326 IAC 6-2 are not applicable.

326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant grinding and machining operations, including FS-1, FS-2, FS-3 and FS-4, shall not exceed an amount determined by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) concrete mixing operation for fire doors (CD-1) is exempt from the requirements of 326 IAC 6-3-2 because the potential particulate emissions are less than 0.551 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2(b)(14), the one (1) quality check (QC) spray booth is exempt from the requirements of 326 IAC 6-3-2 because the surface coating operation uses less than five gallons of coating per day. At a rate of ten (10) ounces of paint per hour, this operation can use at most 240 ounces (1.875) gallons every day.

326 IAC 8-3-2 (Cold Cleaner Operations)

For cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b), for a cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

All emission calculations are based on AP-42 or other IDEM approved emission factors, therefore, no testing is proposed.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less 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 requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions 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 monitoring requirements applicable to this source are as follows:

(a) The one (1) door skin gluing operation (EU2), the one (1) adhesive application station (D2-APP1) have applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 1.1 and/or 18.2) 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 reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stacks 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 in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

(b) The machining operations (EU4), the door machining station (D2-MS1), the machining centers connected to dust collector DC3 (PA-1, CO-1, CO-2, CO-3 and DH-1) and the double cut saw (DCS-1) have applicable compliance monitoring conditions as specified below:

- (1) Visible emission notations of the EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3 stack exhausts (Stacks DC1-1, 20.1, DC3-1) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (2) The Permittee shall record the pressure drop across the dust collector and baghouse used in conjunction with EU4-1 and EU4-2; D2-MS1 and D2-MS1-1; CO-1, CO-2 and CO-3; and DCS-1 at least once per day when any of these facilities are in operation. When for any one reading, the pressure drop across either control device is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reason-

able response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

- (4) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Cyclone failure can be indicated by a significant drop in the cyclone's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

These monitoring conditions are necessary because the dust collector, baghouse and cyclone for the machining operations (EU4), the door machining station (D2-MS1), the machining centers connected to dust collector DC3 (PA-1, CO-1, CO-2, CO-3 and DH-1) and the double cut saw (DCS-1) must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

- (c) The two (2) calcium carbonate silos, identified as SILO1 and SILO2, have applicable compliance monitoring conditions as specified below:

(1) Visible emission notations of the SILO1 and SILO2 stack exhausts (Stacks 25.2 and 25.3) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(2) The Permittee shall record the pressure drop across the baghouses used in conjunction with SILO1 and SILO2 at least once per day when SILO1 or SILO2 is in operation. When for any one reading, the pressure drop across either baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

These monitoring conditions are necessary because the baghouses for the two (2) calcium carbonate silos, identified as SILO1 and SILO2, must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this metal and fiberglass entry door manufacturing source shall be subject to the conditions of this Part 70 Operating Permit Renewal T 033-17546-00019.

**Addendum to Appendix A: Emission Calculations
PM and PM-10 Emissions from Deflashing Station (DF-1)**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Permit Number: T 033-17546-00019
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Application Date: April 7, 2003

Assume worst case: all PM = PM-10

Process	Throughput (skins/hr)	Process Weight Rate (lbs/hr)	Emission Rate (lbs/unit)	Control Efficiency (%)	Potential Particulate Emissions (lbs/hour)	Potential Particulate Emissions (tons/year)	Particulate Emissions after Control (lbs/hour)	Particulate Emissions after Control (tons/year)
DF-1	720.00	13,680	0.026	99.0%	19.05	83.43	0.190	0.834

METHODOLOGY

Potential Emissions (lbs/hr) = Throughput (skins/hr) x Emission Rate (lbs/skin)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Emission rate based on engineering data. Worst case assumed: all material lost is considered potential particulate emissions. Data taken from test where fiberglass door skins were weighed before and after deflashing. For conservatism, all material lost was considered to be potential particulate emissions, even though much of the material removed during the process would not be considered particulate matter due to the size of the material being larger than 100 microns.

**Appendix A: Emission Calculations
Door Machining Operations and Silos**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003

Process	Throughput (units/hr)	Process Weight Rate (lbs/hr)	Emission Rate (lbs/unit)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
EU4 - DC1								
EU4-1	360.00	16,200	0.321	99.0%	115.56	506.15	1.156	5.06
EU4-2	360.00	16,200	0.500	99.0%	180.00	788.40	1.800	7.88
EU4-3	240.00	10,800	0.040	99.0%	9.60	42.05	0.096	0.420
							3.05	13.37
Door Assembly - DC2								
D2-MS1	360.00	18,000	0.706	99.0%	254.16	1113.22	2.542	11.13
D2-MS1-1	360.00	18,000	0.500	99.0%	180.00	788.40	1.800	7.88
							4.34	19.02

METHODOLOGY

Potential Emissions (lbs/hr) = Throughput (units/hr) x Emission Rate (lbs/unit)
 Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)
 Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))
 Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)
 Emission rates based on engineering data. Worst case assumed: all material lost is considered potential particulate emissions.

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
SILO1	99.0%	0.010	2000.0	17.1	75.09	0.171	0.751
SILO2	99.0%	0.010	2000.0	17.1	75.09	0.171	0.751

METHODOLOGY

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
 Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emission Calculations
Formerly Insignificant Machining Operations and Currently Insignificant Activities

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003

Process	Throughput (units/hr)	Process Weight Rate (lbs/hr)	Emission Rate (lbs/unit)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
DC3								
PA-1	11.25	765	0.300	99.0%	3.38	14.78	0.034	0.148
PA-1	11.25	765	0.300	99.0%	3.38	14.78	0.034	0.148
CO-1	50.00	2,450	0.980	99.0%	49.00	214.62	0.490	2.146
CO-2	50.00	2,450	0.980	99.0%	49.00	214.62	0.490	2.146
CO-3	50.00	2,450	0.980	99.0%	49.00	214.62	0.490	2.146
DH-1	15.63	703	0.320	99.0%	5.00	21.90	0.050	0.219
							1.588	6.953
DCS-1	130.00	2,470	0.247	98.0%	32.11	140.64	0.642	2.813
Insignificant Activities								
FS-1	16.91	321	0.077	98.0%	1.30	5.70	0.026	0.114
FS-2	16.91	321	0.171	98.0%	2.89	12.67	0.058	0.253
FS-3	16.91	321	0.171	98.0%	2.89	12.67	0.058	0.253
FS-4	16.91	321	0.171	98.0%	2.89	12.67	0.058	0.253
CD-1	18.00	974	0.014	99.0%	0.25	1.10	0.003	0.011

METHODOLOGY

Potential Emissions (lbs/hr) = Throughput (units/hr) x Emission Rate (lbs/unit)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Emission rates based on engineering data. Worst case assumed: all material lost is considered potential particulate emissions.

Emission rate for CD-1 based on AP-42 Table 11.12-2 (concrete batching)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - EU3 Flowcoater**

**Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
EU3																
Grey Water Reducible Primer	11.01	56.85%	52.0%	4.86%	69.9%	38.89%	0.08400	360.000	1.78	0.54	16.19	388.62	70.92	0.00	1.38	100%
Antique White W/R Primer	11.01	57.87%	52.9%	5.00%	69.8%	35.45%	0.08400	360.000	1.82	0.55	16.64	399.25	72.86	0.00	1.55	100%

State Potential Emissions	Add worst case coating to all solvents	PM	Control Efficiency	90.00%	Uncontrolled	16.6	399.2	72.9	0.00
			Controlled		16.6	399.2	72.9	0.00	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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

HAPs

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Diethylene Glycol Monobutyl Ether	DGME Emissions (ton/yr)
EU3					
Grey Water Reducible Primer	11.01	0.08400	360.000	0.08%	1.167
Antique White W/R Primer	11.01	0.08400	360.000	0.06%	0.875

Worst Case: 1.167

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
From Fiberglass Press Operations**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003

Press ID	Installation Date	SMC Capacity (lbs/hr)	Max VOC Content (Styrene) (%)	Emission Factor (%)	VOC and Styrene Potential (lbs/hr)	VOC and Styrene Potential (tons/yr)
1	1989	1,067	10.9%	3.0%	3.49	15.28
2	1989	1,067	10.9%	3.0%	3.49	15.28
3	1989	1,067	10.9%	3.0%	3.49	15.28
4	1989	1,067	10.9%	3.0%	3.49	15.28
5	1989	1,067	10.9%	3.0%	3.49	15.28
6	1989	1,067	10.9%	3.0%	3.49	15.28
7	1989	1,067	10.9%	3.0%	3.49	15.28
8	1989	1,067	10.9%	3.0%	3.49	15.28
9	1999	862.5	12.0%	3.0%	3.11	13.60
11	2000	1,067	10.9%	3.0%	3.49	15.28
12	2000	1,067	10.9%	3.0%	3.49	15.28
13	2000	1,067	10.9%	3.0%	3.49	15.28
14	2000	1,067	10.9%	3.0%	3.49	15.28
15	2001	1,067	10.9%	3.0%	3.49	15.28
16	2001	1,067	10.9%	3.0%	3.49	15.28
17	2002	1,067	10.9%	3.0%	3.49	15.28
18	2002	1,067	10.9%	3.0%	3.49	15.28
19	2002	1,067	10.9%	3.0%	3.49	15.28
20	2002	1,067	10.9%	3.0%	3.49	15.28
				17-20 Limit:		40.00
21	2005	1,067	10.9%	3.0%	3.49	15.28
22	2005	1,067	10.9%	3.0%	3.49	15.28
23	2005	1,067	10.9%	3.0%	3.49	15.28
24	2005	1,067	10.9%	3.0%	3.49	15.28
25	2005	1,067	10.9%	3.0%	3.49	15.28
				21-25 Limit:		37.68
Total						305.23

METHODOLOGY

IDEM approved emission factor taken from the former AP-42 Ch 4.4 for closed molding operations
Potential Emissions (lbs/hour) = SMC Capacity (lbs/hour) * VOC (Styrene) Content (%) * Emission Factor (%)
Potential Emissions (tons/year) = Potential Emissions (lbs/hour) * 8,760 hours/year / 2000 lbs/ton
All VOC is Styrene
SMC capacity and VOC/Styrene content is dependent on the size of mold used. The capacity and content used above represent the combination which results in the worst case emissions for each press.

**Appendix A: Emissions Calculations
VOC and HAP Emissions
From SMC Production**

**Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003**

Material	SMC Usage (lbs/hour)	SMC Usage (tons/hour)	Emission Factor (lbs/ton)	Potential Emissions (lb/hr)	Potential Emissions (tons/yr)
Resin Storage Tanks					
VOC	18,500	9.25	0.059	0.546	2.39
Styrene	18,500	9.25	0.059	0.546	2.39
Mixing Station					
VOC	18,500	9.25	0.19	1.758	7.70
Styrene	18,500	9.25	0.19	1.758	7.70
SMC Machine					
VOC	18,500	9.25	0.30	2.775	12.2
Styrene	18,500	9.25	0.30	2.775	12.2
SMC Holding Area					
VOC	18,500	9.25	0.0018	0.017	0.073
Styrene	18,500	9.25	0.0018	0.017	0.073
State Potential Emissions				Total VOC:	22.32
				Total Styrene	22.32

METHODOLOGY

Potential Emissions Pounds per Hour = Tons of material used per hour * Emission factor (lbs/ton)

Potential VOC Tons per Year = Potential VOC Pounds per hour * 8760 hrs/yr / 2000 lbs/ton

Emission Factors are based on "Q and A: Composites Manufacturing Emissions" published by the CFA in 1999

Emission factors for the Mixing Station are based on emission factors approved by the Ohio EPA for the same process. These factors were based on a stack test.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

111.50

977

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.928	3.712	0.293	48.837	2.686	41.023

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 8 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
Part 70: 033-17546
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: April 7, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.001026	0.000586	0.036628	0.879065	0.001660

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00024	0.00054	0.00068	0.00019	0.00103	0.922

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.