



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: December 11, 2007
RE: Frontline Manufacturing, Inc. / 085-17770-00070
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Frontline Manufacturing, Inc.
306 School Street
Leesburg, Indiana 46538**

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

Operation Permit No.: T085-17770-00070	
Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 11, 2007 Expiration Date: December 11, 2012

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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 stationary fiberglass tub and shower manufacturing operation.

Source Address:	306 School Street, Leesburg, Indiana 46538
Mailing Address:	306 School Street, Leesburg, Indiana 46538
General Source Phone Number:	574-453-2902
SIC Code:	3088
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Four (4) Gel Spray Guns, identified as Emission Unit (EU) AA, rated at 148 pounds per hour, consisting of three (3) Glasscraft Model No. LPA2-100 and one (1) Magnum VRP 1000, (spraying only one color at a time) utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to one stack identified as S/V C, installed in 1995;
- (b) Two (2) Magnum VRP 1000, Resin Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to two (2) stacks identified as S/V A and B, installed in 1995; and
- (c) One (1) Mold Shop, identified as MS, consisting of resin spray guns and gel coat spray guns, utilizing mechanical non-atomized fluid impingement spray for resins and an HVLP cup spray gun for gel coat, with dry filters for particulate control, and exhausting through one (1) wall vent, installed in 1995.

Under NESHAP WWWW, this source is considered an existing affected source.

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):

- (a) One resin mix tank for mixing resin with inert ingredients. Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility;
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

- (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility; and

- (c) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C). Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility.

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, T085-17770-00070, 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 13-15-3-3. 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, 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

The submittal by the Permittee does require 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) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

The notification which shall be submitted by the Permittee does not require 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 T085-17770-00070 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 combined permit, all previous registrations and permits are superseded by this combined new source review and 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
MC 61-53 IGCN 1003
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 noncompliance 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(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified 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 modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(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 the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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
MC 61-53 IGCN 1003
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 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 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 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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.7 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require 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.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require 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.10 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.11 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.12 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 in August, 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.13 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.14 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; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 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 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(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
MC 61-50 IGCN 1003
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 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.

Stratospheric Ozone Protection

C.19 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:

- (a) Four (4) Gel Spray Guns, identified as Emission Unit (EU) AA, rated at 148 pounds per hour, consisting of three (3) Glasscraft Model No. LPA2-100 and one (1) Magnum VRP 1000, (spraying only one color at a time) utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to one stack identified as S/V C, installed in 1995;
- (b) Two (2) Magnum VRP 1000, Resin Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to two (2) stacks identified as S/V A and B, installed in 1995;
- (c) One (1) Mold Shop, identified as MS, consisting of resin spray guns and gel coat spray guns, utilizing mechanical non-atomized fluid impingement spray for resins and an HVLP cup spray gun for gel coat, with dry filters for particulate control, and exhausting through one (1) wall vent, installed in 1995.
- (d) One resin mix tank for mixing resin with inert ingredients;
- (e) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 month; and
- (f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

Under NESHAP WWW, this source is considered an existing affected source.

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

Pursuant to T085-7186-00070, issued on July 12, 1999, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for EU AA, BB, and CC shall be as follows:

- (a) The Permittee shall limit the use of all gel coats, resins, catalysts, and mold release to EU AA, BB, and CC such that the potential to emit of VOC is limited to less than 197.1 tons per 12 consecutive month period to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).
- (b) the following work practices have been determined to be BACT for the five (5) spray guns:

- (1) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
 - (2) proper testing of spray guns prior to daily use;
 - (3) proper equipment clean-up and maintenance;
 - (4) all resins and gelcoats will be applied with air assisted airless spray applicators;
 - (5) spray cleaners will be cleaned with acetone;
 - (6) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (7) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
 - (8) the overspray shall be minimized by spraying as close as practical into the molds;
 - (9) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;
 - (10) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
 - (11) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) The allowable VOC emissions from the gel coat spray guns (EU AA) will be 76.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 120.36 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded.

Compliance with the VOC limits pursuant to 326 IAC 8-1-6 (BACT) in (a) and (c), shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) Particulate matter emissions the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed 55.93 pounds per hour; and
- (b) PM₁₀ emissions the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed 55.93 pounds per hour.

This limits total source wide PM and PM10 emissions each to less than 250 tons per year. Therefore, compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications

D.1.4 Operator Training [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring;
 - (2) To ensure training goals listed in Condition D.1.4(b) are maintained, all personnel shall be given refresher training annually; and
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from Condition D.1.4(a)(1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques;
 - (2) Appropriate equipment cleaning procedures; and
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
 - (1) A copy of the current training program;
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained; and
 - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of these facilities and their control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitations contained in Condition D.1.1 shall be determined from the manufacturer's Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst and solvent used in the fiberglass composite manufacturing operations. The VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates, except use of controlled spray emission factors must be approved by the commissioner. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.7 Particulate Control

In order to comply with Conditions D.1.2 and D.1.3, the dry filters for particulate control shall be in operation and control emissions from the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop, at all times that the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop are in operation.

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

D.1.8 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V A, B, C and the Mold Shop wall vent) 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.

Compliance with these requirements satisfies the requirements of 40 CFR 64 (CAM) for resin spray guns, identified as EU BB and CC.

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

D.1.9 Record Keeping Requirements

- (a) To document 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 emission limits 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 amount and VOC content of each gel coat, resin, catalyst and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The total VOC usage for each month; and
- (3) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.8 the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its record when a weekly overspray observation, daily inspections and monthly inspection notation is not taken and the reason for the lack of weekly overspray observation, daily inspections and monthly inspection notation (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions 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 an "responsible official" as defined by 326 IAC 2-7-1(34).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.11 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (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 schedule in 40 CFR 63 Subpart WWWW.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

D.1.12 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: Requirements [40 CFR Part 63, Subpart WWWW] [326 IAC 20-56]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780, as specified as follows:

§ 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.

(d) Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

§ 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.

§ 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

§ 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.

§ 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

(a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850.

(b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.

§ 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in §63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in §63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

(b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.

(1) *Use a calculated emission factor.* Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

(2) *Conduct performance testing.* Conduct performance testing using the test procedures in §63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in §63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

§ 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 an 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.

(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.

§ 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.* (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100} \quad (\text{Eq. 1})$$

Where:

Percent Control Efficiency=a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850 to this subpart.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i , lbs/ton;

Material_i =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;

n =number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

Material_i=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations.

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i=Actual organic HAP emissions factor for operation type i, lbs/ton;

Material_i=neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

§ 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).

§ 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 an 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.

§ 63.5895 How do I monitor and collect data to demonstrate continuous compliance?

(b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.

(4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

§ 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.

(2) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).

(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.

§ 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.

(6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(d) For each deviation from an 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).

(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart.

(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.

§ 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 or 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 or 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 pre-coated 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 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams¹

As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation type is a new or existing. . .	And you use. . .	With. . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ^{2 3 4}	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ^{2 3 4}
1. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = ((0.286 x %HAP) – 0.0529) x 2000
		ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (1-(0.5 x VSE Factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE Factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		iv. vacuum bagging/closed-mold curing without roll out	EF = (0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP) – 0.0529) x 2000 x 0.5
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.157 x %HAP) – 0.0165) x 2000
		ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE Factor))	EF = ((0.157 x %HAP) – 0.0165) x 2000 x (1-(0.45 x VSE Factor))
		iii. closed-mold curing with roll out	EF = 0.107 x %HAP x 2000 x 0.85	EF = ((0.157 x %HAP) - 0.0165) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll out	EF = (0.107 x %HAP x 2000 x 0.55	EF = ((0.157 x %HAP) – 0.0165) x 2000 x 0.55
	e. filament application ⁶	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	EF = ((0.2746 x %HAP) – 0.0298) x 2000
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2746 x %HAP) – 0.0298) x 2000 x 0.65
	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = ((0.4506 x %HAP) – 0.0505) x 2000

Footnotes to Table 1

¹ The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

² To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

⁴ The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

⁶ Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

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 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As required in §§63.5796, 63.5805 (a) through (c) and (g), 63.5810(a), (b), and (d), 63.5820(c), 63.5830, 63.5835(a), 63.5895(c) and (d), 63.5900(a)(2), and 63.5915(c), you must meet the appropriate organic HAP emissions limits in the following table:

If your operation type is . . .	And you use . . .	¹Your organic HAP emissions limit is. . .
1. open molding – corrosion-resistant and/or high strength (CR/HS).	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton 171 lb/ton 123 lb/ton
2. open molding – non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton 188 lb/ton 87 lb/ton
3. open molding – tooling	a. mechanical resin application b. manual resin application	254 lb/ton 157 lb/ton
4. open molding – low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton 238 lb/ton
5. open molding – shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton 215 lb/ton 180 lb/ton
6. open molding – gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton 267 lb/ton 377 lb/ton 605 lb/ton 854 lb/ton 522 lb/ton

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

² This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate any emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat equation to calculate emission factors.

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

[As required in §§63.5805 (a) through (d) and (g), 63.5835(a), 63.5900(a)(3), 63.5910(c)(5), and 63.5915(d), you must meet the appropriate work practice standards in the following table:]

For . . .	You must . . .
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.
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.
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	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Footnotes to Table 4

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 5 to Subpart WWWW of Part 63 – Alternative Organic HAP Emissions limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations where the standard is based on a 95 percent reduction requirement

[As specified in §§63.5796, 63.5805(b) and (d), 6.5810(a) and (b), 63.5895(c), 63.5900(a)(2), and 63.5915(c), as an alternative to the 95 percent organic HAP emissions reductions requirement, you may meet the appropriate organic HAP emissions limits in the following table:]

If your operation type is . . .	And you use . . .	Your organic HAP emissions limit is ¹
1. Open molding – corrosion-resistant and/or high strength (CR/HS).	a. Mechanical resin application b. Filament application c. Manual resin application	6 lb/ton 9 lb/ton 7 lb/ton
2. Open molding – non-CR/HS	a. Mechanical resin application b. Filament application c. Manual resin application	13 lb/ton 10 lb/ton 5 lb/ton
3. Open molding - tooling	a. Mechanical resin application b. Filament application	13 lb/ton 8 lb/ton
4. Open molding – low flame spread/low smoke products	a. Mechanical resin application b. Filament application c. Manual resin application	25 lb/ton 14 lb/ton 12 lb/ton
5. Open molding – shrinkage controlled resins	a. Mechanical resin application b. Filament application c. Manual resin application	18 lb/ton 11 lb/ton 9 lb/ton
6. Open molding – gel coat ²	a. Tooling gel coating b. White/off white pigmented gel coating c. All other pigmented gel coating d. CR/HS or high performance gel coat e. Fire retardant gel coat f. Clear production gel coat	22 lb/ton 22 lb/ton 19 lb/ton 31 lb/ton 43 lb/ton 27 lb/ton

¹ Organic HAP emissions limits for open molding and centrifugal casting expressed as lb/ton are calculated using the equations shown in Table 1 to this subpart. You must be at or below these values based on a 12-month rolling average.

² These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

As specified in § 63.5810(d), when electing to use the same resin(s) for multiple resin application methods, you may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . .	Is . . .
2. CR/HS resins, nonatomized mechanical	b. CR/HS filament application	46.4
	c. CR/HS manual	46.4
5. Non-CR/HS resins, nonatomized mechanical	a. Non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting ^{1 2}	38.5
7. Tooling resins, nonatomized mechanical	Tooling manual	91.4
8. Tooling resins, manual	Tooling atomized mechanical	45.9

¹ If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

² If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

Table 8 to Subpart WWWW of Part 63—Initial Compliance with Organic HAP Emissions Limits

As required in §63.5860(a), you must demonstrate initial compliance with organic HAP emissions limits as specified in the following table:

For . . .	That must meet the following organic HAP emissions limit. . .	You have demonstrated initial compliance if. . .
1. open molding and centrifugal casting operations.	a. an organic HAP emissions limit shown in Tables 3 and 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average ¹ year after the appropriate compliance date, and/or ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.
2. open molding centrifugal casting, continuous lamination/casting, SMC and BMC manufacturing, and mixing operations.	a. reduce total organic HAP emissions by at least 95 percent by weight.	Total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this Subpart, are reduced by at least 95 percent by weight.

Table 9 to Subpart WWWW of Part 63—Initial Compliance with Work Practice Standards

As required 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. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	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 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 material, and that any bulk storage tanks are vented only as necessary for safety.

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).
2. Qualifies for a compliance extension as specified in § 63.9(c).	A request for a compliance extension as specified in § 63.9(c).	No later than the dates specified in § 63.6(i).
3. Qualifies for a compliance extension as specified in § 63.9(c).	A request for a compliance extension as specified in § 63.9(c).	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facility's compliance date.

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	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.	Semiannually according to the requirements in § 63.5910(b).
	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).	Semiannually according to the requirements in § 63.5910(b).
	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.	Semiannually according to the requirements in § 63.5910(b).
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.	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in § 63.10(d)(5)(ii)	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)).

Table 15 to Subpart WWWW of Part 63—Applicability of General Provisions to Subpart WWWW of Part 63

As specified in Sec.63.5925, the parts of the General Provisions which apply to you are shown in the following table:]

The general provisions reference. . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
Sec. 63.1(a)(1).....	General applicability of the general provisions.	Yes.....	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
Sec. 63.1(a)(2) through (4).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(a)(5).....	Reserved.....	No.....	
Sec. 63.1(a)(6).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(a)(7) through (9).....	Reserved.....	No.....	
Sec. 63.1(a)(10) through (14).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(b)(1).....	Initial applicability determination.	Yes.....	Subpart WWWW of Part 63 clarifies the applicability inSec. Sec. 63.5780 and 63.5785.
Sec. 63.1(b)(2).....	Reserved.....	No.....	
Sec. 63.1(b)(3).....	Record of the applicability determination.	Yes.....	

Sec. 63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part.	Yes	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
Sec. 63.1(c)(2)	Title V operating permit requirement.	Yes	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
Sec. 63.1(c)(3) and (4)	Reserved	No	
Sec. 63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes	
Sec. 63.1(d)	Reserved	No	
Sec. 63.1(e)	Applicability of permit program before a relevant standard has been set under this part.	Yes	
Sec. 63.2	Definitions	Yes	Subpart WWWW of Part 63 defines terms in Sec. 63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.

Sec. 63.3.....	Units and abbreviations	Yes.....	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
Sec. 63.4.....	Prohibited activities and circumvention.	Yes.....	Sec. 63.4(a)(3) through (5) is reserved and does not apply.
Sec. 63.5(a)(1) and (2).....	Applicability of construction and reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(1).....	Relevant standards for new sources upon construction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(2).....	Reserved.....	No.....	
Sec. 63.5(b)(3).....	New construction/reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(4).....	Construction/reconstruction notification.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(5).....	Reserved.....	No.....	
Sec. 63.5(b)(6).....	Equipment addition or process change.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(c).....	Reserved.....	No.....	

Sec. 63.5(d)(1)	General application for approval of construction or reconstruction.	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(d)(2)	Application for approval of construction.	Yes	
Sec. 63.5(d)(3)	Application for approval of reconstruction.	No	
Sec. 63.5(d)(4)	Additional information.	Yes	
Sec. 63.5(e)(1) through (5)	Approval of construction or reconstruction.	Yes	
Sec. 63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review.	Yes	
Sec. 63.6(a)(1)	Applicability of compliance with standards and maintenance requirements.	Yes	
Sec. 63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources.	Yes	
Sec. 63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources.	Yes	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6(b)(6)	Reserved.	No	
Sec. 63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source.	Yes	New operations at an existing facility are not subject to new source standards.

Sec. 63.6(c)(1) and (2).....	Compliance dates for existing sources.	Yes.....	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6(c)(3) and (4).....	Reserved.....	No.....	
Sec. 63.6(c)(5).....	Compliance dates for existing area sources that become major.	Yes.....	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6(d).....	Reserved.....	No.....	
Sec. 63.6(e)(1) and (2).....	Operation & maintenance requirements.	Yes.....	
Sec. 63.6(e)(3).....	Startup, shutdown, and malfunction plan and recordkeeping.	Yes.....	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
Sec. 63.6(f)(1).....	Compliance except during periods of startup, shutdown, and malfunction.	No.....	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
Sec. 63.6(f)(2) and (3).....	Methods for determining compliance.	Yes.....	
Sec. 63.6(g)(1) through (3).....	Alternative standard...	Yes.....	
Sec. 63.6(h).....	Opacity and visible emission Standards.	No.....	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.6(i)(1) through (14).....	Compliance extensions..	Yes.....	
Sec. 63.6(i)(15).....	Reserved.....	No.....	
Sec. 63.6(i)(16).....	Compliance extensions..	Yes.....	
Sec. 63.6(j).....	Presidential compliance exemption.	Yes.....	

Sec. 63.7(a)(1)	Applicability of performance testing requirements.	Yes	
Sec. 63.7(a)(2)	Performance test dates.	No	Subpart WWWW of Part 63 initial compliance requirements are in Sec. 63.5840.
Sec. 63.7(a)(3)	CAA Section 114 authority.	Yes	
Sec. 63.7(b)(1)	Notification of performance test.	Yes	
Sec. 63.7(b)(2)	Notification rescheduled performance test.	Yes	
Sec. 63.7(c)	Quality assurance program, including test plan.	Yes	Except that the test plan must be submitted with the notification of the performance test.
Sec. 63.7(d)	Performance testing facilities.	Yes	
Sec. 63.7(e)	Conditions for conducting performance tests.	Yes	Performance test requirements are contained in Sec. 63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in Sec. 63.5870.
Sec. 63.7(f)	Use of alternative test method.	Yes	
Sec. 63.7(g)	Performance test data analysis, recordkeeping, and reporting.	Yes	
Sec. 63.7(h)	Waiver of performance tests.	Yes	
Sec. 63.8(a)(1) and (2)	Applicability of Monitoring requirements.	Yes	

Sec. 63.8(a)(3)	Reserved	No	
Sec. 63.8(a)(4)	Monitoring requirements when using flares.	Yes	
Sec. 63.8(b)(1)	Conduct of monitoring exceptions.	Yes	
Sec. 63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems.	Yes	
Sec. 63.8(c)(1)	Compliance with CMS operation and maintenance requirements.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(c)(2) and (3)	Monitoring system installation.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures.	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(d)	CMS quality control program, including test plan and all previous versions.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

Sec. 63.8(e)(1)	Performance evaluation of CMS.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(2)	Notification of performance evaluation.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(3) and (4)	CMS requirements/alternatives.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(5)(i)	Reporting performance evaluation results.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(5)(ii)	Results of COMS performance evaluation.	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.8(f)(1) through (3)	Use of an alternative monitoring method.	Yes	
Sec. 63.8(f)(4)	Request to use an alternative monitoring method.	Yes	
Sec. 63.8(f)(5)	Approval of request to use an alternative monitoring method.	Yes	
Sec. 63.8(f)(6)	Request for alternative to relative accuracy test and associated records.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

Sec.	63.8(g)(1) through (5).....	Data reduction.....	Yes.....	
Sec.	63.9(a)(1) through (4).....	Notification requirements and general information.	Yes.....	
Sec.	63.9(b)(1).....	Initial notification applicability.	Yes.....	
Sec.	63.9(b)(2).....	Notification for affected source with initial startup before effective date of standard.	Yes.....	
Sec.	63.9(b)(3).....	Reserved.....	No.....	
Sec.	63.9(b)(4)(i).....	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes.....	
Sec.	63.9(b)(4)(ii) through (iv)...	Reserved.....	No.....	
Sec.	63.9(b)(4)(v).....	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.

Sec. 63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required.	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.9(c)	Request for compliance extension.	Yes	
Sec. 63.9(d)	Notification of special compliance requirements for new source.	Yes	
Sec. 63.9(e)	Notification of performance test.	Yes	
Sec. 63.9(f)	Notification of opacity and visible emissions observations.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.9(g)(1)	Additional notification requirements for sources using CMS.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9(g)(2)	Notification of compliance with opacity emission standard.	No	Subpart WWWW of Part 63 does not contain opacity emission standards.
Sec. 63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

Sec. 63.9(h)(1) through (3).....	Notification of compliance status.	Yes.....	
Sec. 63.9(h)(4).....	Reserved.....	No.....	
Sec. 63.9(h)(5) and (6).....	Notification of compliance status.	Yes.....	
Sec. 63.9(i).....	Adjustment of submittal deadlines.	Yes.....	
Sec. 63.9(j).....	Change in information provided.	Yes.....	
Sec. 63.10(a).....	Applicability of recordkeeping and reporting.	Yes.....	
Sec. 63.10(b)(1).....	Records retention.....	Yes.....	
Sec. 63.10(b)(2)(i) through (v)....	Records related to startup, shutdown, and malfunction.	Yes.....	Only applies to facilities that use an add-on control device.
Sec. 63.10(b)(2)(vi) through (xi)..	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations.	Yes.....	
Sec. 63.10(b)(2)(xii).....	Record of waiver of recordkeeping and reporting.	Yes.....	
Sec. 63.10(b)(2)(xiii).....	Record for alternative to the relative accuracy test.	Yes.....	
Sec. 63.10(b)(2)(xiv).....	Records supporting initial notification and notification of compliance status.	Yes.....	
Sec. 63.10(b)(3).....	Records for applicability determinations.	Yes.....	

Sec. 63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10(c)(2) through (4)	Reserved	No	
Sec. 63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10(c)(9)	Reserved	No	
Sec. 63.10(c)(10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10(d)(1)	General reporting requirements.	Yes	
Sec. 63.10(d)(2)	Report of performance test results.	Yes	
Sec. 63.10(d)(3)	Reporting results of opacity or visible emission observations.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.10(d)(4)	Progress reports as part of extension of compliance.	Yes	
Sec. 63.10(d)(5)	Startup, shutdown, and malfunction reports.	Yes	Only applies if you use an add-on control device.

Sec. 63.10(e)(1) through (3).....	Additional reporting requirements for CMS.	Yes.....	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
Sec. 63.10(e)(4).....	Reporting COMS data....	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.10(f).....	Waiver for recordkeeping or reporting.	Yes.....	
Sec. 63.11.....	Control device requirements.	Yes.....	Only applies if you elect to use a flare as a control device.
Sec. 63.12.....	State authority and delegations.	Yes.....	
Sec. 63.13.....	Addresses of State air pollution control agencies and EPA Regional Offices.	Yes.....	
Sec. 63.14.....	Incorporations by reference.	Yes.....	
Sec. 63.15.....	Availability of information and confidentiality.	Yes.....	

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Frontline Manufacturing, Inc.
Source Address: 306 School Street, Leesburg, Indiana 46538
Mailing Address: 306 School Street, Leesburg, Indiana 46538
Part 70 Permit No.: T085-17770-00070

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Frontline Manufacturing, Inc.
Source Address: 306 School Street, Leesburg, Indiana 46538
Mailing Address: 306 School Street, Leesburg, Indiana 46538
Part 70 Permit No.: T085-17770-00070

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
 - 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
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: Frontline Manufacturing, Inc.
 Source Address: 306 School Street, Leesburg, Indiana 46538
 Mailing Address: 306 School Street, Leesburg, Indiana 46538
 Part 70 Permit No.: T085-17770-00070
 Facility: EU AA, BB, and CC
 Parameter: VOC usage
 Limit: The Permittee shall limit the use of all gel coats, resins, catalysts, and mold release to EU AA, BB and CC, such that the potential to emit of VOC is limited to less than 197.1 tons per 12 consecutive month period.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

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: Frontline Manufacturing, Inc.
 Source Address: 306 School Street, Leesburg, Indiana 46538
 Mailing Address: 306 School Street, Leesburg, Indiana 46538
 Part 70 Permit No.: T085-17770-00070

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:	Frontline Manufacturing, Inc.
Source Location:	306 School Street, Leesburg, Indiana 46538
County:	Kosciusko
SIC Code:	3088
Permit Renewal No.:	T085-17770-00070
Permit Reviewer:	Julia Handley/EVP

On September 20, 2007, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Frontline Manufacturing, Inc. had applied for a Part 70 Operating Permit Renewal to continue to operate a fiberglass tub and shower manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On September 21, 2007, Frontline Manufacturing, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in **bold**, deletions in ~~strikeout~~):

Comment 1:

The name of the facility should be changed to "Frontline Manufacturing, Inc." throughout the permit and TSD.

Response to Comment 1:

The name of the facility has been changed from ~~Front Line~~ Manufacturing, Inc. to **Frontline** Manufacturing, Inc. throughout the permit.

Comment 2:

There are actually two Trim Booths located at this facility. Each booth utilizes two circular saws and two grinders. Therefore, the number of saws and grinders referenced in Section A.2(c) and (d) should be changed from two to four.

Response to Comment 2:

The emission units listed under Condition A.2(c) and (d) each have potential uncontrolled PM emissions less than 5 pounds per hour and, pursuant to 326 IAC 2-7-1(21)(A), are insignificant activities. These units are not specifically regulated insignificant units, so they have been removed from the permit. These units will be listed in the TSD for reference. Condition D.1.2 has been revised to limit source wide PM and PM10 emissions to less than 250 tons per year. Condition A.2 has been revised as shown below. Revised emission calculations for the new insignificant booths have been included as Appendix A to this TSD Addendum.

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

- ~~(c) Two (2) Circular Saws, identified as EU DD and EE, each rated at 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.~~
- ~~(d) Two (2) Grinders, identified as EU FF and GG, each rated at 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.~~

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) Particulate matter emissions the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed ~~56.85~~ **55.93** pounds per hour; and
- (b) PM₁₀ emissions the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed ~~56.85~~ **55.93** pounds per hour.

This limits total source wide PM and PM10 emissions each to less than 250 tons per year. Therefore, compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

It is noted here that this source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (i) Four (4) Circular Saws, identified as EU DD, EE, KK, and LL, each rated at 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.**
- (j) Four (4) Grinders, identified as EU FF, GG, MM, and NN, each rated at 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.**

Comment 3:

The Mold Shop referenced in Section A.2(g) has been in use since the day this facility first began operation (1995). The Mold Shop is where the molds for the fiberglass parts are actually made, and this is the first step in the entire fiberglass manufacturing process. We believe the minor usage of tooling resin and gelcoat in the Mold Shop makes this an insignificant activity, which is consistent with how this process is identified in other fiberglass manufacturing permits (e.g., refer to Better Way Partners Title V permit renewal # T039-18584-00141 issued 9/5/07). Even as an Insignificant Activity, the Mold Shop is still subject to the RPC MACT Standard requirements. However, the compliance monitoring requirements identified in Condition D.1.8(a) and (b) should not apply to this activity.

Response to Comment 3:

The Mold Shop (identified as MS) has potential PM emissions greater than 25 pounds per day and potential single HAP (styrene) emissions greater than 1 ton per year; therefore, pursuant to 326 IAC 2-7-1(21)(A), the Mold Shop does not qualify as an insignificant activity.

In addition, 326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The dry filter for particulate control must operate properly in order for the processes to achieve compliance with the applicable PM emission limits; therefore, IDEM believes it is reasonable and necessary to require daily monitoring of the filters. No changes have been made to Condition D.1.8 as a result of this comment.

The construction date listed in Condition A.2(g) has been revised as shown below.

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

- ~~(g)~~(c) One (1) Mold Shop, identified as MS, consisting of resin spray guns and gel coat spray guns, utilizing mechanical non-atomized fluid impingement spray for resins and an HVLP cup spray gun for gel coat, with dry filters for particulate control, and exhausting through one (1) wall vent, installed in ~~2000~~1995.

Comment 4:

The Leesburg facility utilizes several other insignificant activities that should be identified in the permit. These activities are as follows:

- (a) One resin mix tank for mixing resin with inert ingredients.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

- (d) Welding operations related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process.

Response to Comment 4:

The insignificant units listed as (a) through (c) in Comment 4 are specifically regulated under 40 CFR part 63, Subpart WWWW. Therefore, these units have been added to the permit under Condition A.3 as shown below. These equipment descriptions have also been listed in section D.1 without duplication herein.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.~~ **This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):**

- (a) **One resin mix tank for mixing resin with inert ingredients. Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility;**
- (b) **Cleaners and solvents characterized as follows:**
- (1) **having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;**
- (2) **having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.**
- the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility; and**
- (c) **Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C). Under 40 CFR Part 63, Subpart WWWW, this is considered an existing affected facility.**

The welding operation is not a specifically regulated activity and, therefore, will not be listed under Condition A.3. However, this maintenance welding activity will be listed in the TSD for reference.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

It is noted here that this source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (k) Welding operations related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit (additions in **bold**, deletions in ~~strikeout~~):

Revision 1:

The emission units listed under Condition A.2(e) and (f) have potential uncontrolled PM emissions less than 5 pounds per hour and, pursuant to 326 IAC 2-7-1(21)(A), are insignificant activities. These units are not specifically regulated insignificant units, so they have been removed from the permit. Condition A.2 is revised as shown below.

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:

~~(e) Two (2) small chop saws, identified as HH, each rated at 231 pounds per hour, uncontrolled and not exhausting to a stack.~~

~~(f) One (1) radial arm saw and one (1) table saw, identified as II and JJ, located in the saw room, each with a throughput capacity of 231 pounds per hour, uncontrolled and not exhausting to a stack.~~

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

It is noted here that the two (2) small chop saws, identified as HH, and one (1) radial arm saw and one (1) table saw, identified as II and JJ, are insignificant activities, as defined in 326 IAC 2-7-1(21).

**Appendix A: Emission Calculations
PM and PM10 Generated from Sawing/Cutting**

Company Name: Front Line Manufacturing, Inc.
Address City IN Zip: 306 School Street, Leesburg, Indiana 46538
Permit Number: T085-17770-00070
Reviewer: Julia Handley/EVP

Emission Unit	Maximum Rate (lb/hr)	Emission Factors (lb/ton)		Emission Rate (lbs/hr)		Maximum Uncontrolled Emissions (tons/yr)		Maximum Controlled Emissions (tons/yr)	
		PM	PM10	PM	PM10	PM	PM10	PM	PM10
DD	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
EE	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
FF	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
GG	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
HH	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
II	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
JJ	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
KK	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
LL	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
MM	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
NN	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
Total:						1.95	1.95	0.55	0.55

Note: Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
 Controlled emissions based on cartridge filter system control efficiency of 99%.

**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:	Front Line Manufacturing, Inc.
Source Location:	306 School Street, Leesburg, Indiana 46538
County:	Kosciusko
SIC Code:	3088
Permit Renewal No.:	T085-17770-00070
Permit Reviewer:	Julia Handley/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Front Line Manufacturing, Inc. relating to the operation of a fiberglass tub and shower manufacturing operation.

History

On July 31, 2003, Front Line Manufacturing, Inc. submitted an application to the OAQ requesting to renew its operating permit. Front Line Manufacturing, Inc. was issued a Part 70 Operating Permit on July 12, 1999.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Four (4) Gel Spray Guns, identified as Emission Unit (EU) AA, rated at 148 pounds per hour, consisting of three (3) Glasscraft Model No. LPA2-100 and one (1) Magnum VRP 1000, (spraying only one color at a time) utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to one stack identified as S/V C, installed in 1995;
- (b) Two (2) Magnum VRP 1000, Resin Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to two (2) stacks identified as S/V A and B, installed in 1995; and
- (c) Two (2) Circular Saws, identified as EU DD and EE, each with a throughput capacity of 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.
- (c) Two (2) Grinders, identified as EU FF and GG, each with a throughput capacity of 231 pounds per hour, with one (1) Torit cartridge filter system for particulate control, not exhausting to a stack, installed in 1995. Filtered air from the control device is re-circulated into the grinding booth, where the units are located.
- (e) Two (2) small chop saws, identified as HH, with a throughput capacity of 231 pounds per hour, uncontrolled and not exhausting to a stack.

- (f) One (1) radial arm saw and one (1) table saw, identified as II and JJ, located in the saw room, each with a throughput capacity of 231 pounds per hour, uncontrolled and not exhausting to a stack.

Under NESHAP WWWWW, this source is considered an existing affected source.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source also consists of the following emission unit that was constructed and is operating without a permit:

- (a) One (1) Mold Shop, identified as MS, consisting of resin spray guns and gel coat spray guns, utilizing mechanical non-atomized fluid impingement spray for resins and an HVLP cup spray gun for gel coat, with dry filters for particulate control, and exhausting through one (1) wall vent, installed in 2000.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

- (a) One (1) mold storage heater, rated at 0.09625 MMBtu/hr;
- (b) One (1) mold storage heater, rated at 0.2 MMBtu/hr;
- (c) Two (2) final heaters, each rated at 0.16 MMBtu/hr;
- (d) One (1) warehouse heater, rated at 0.1155 MMBtu/hr;
- (e) One (1) dock heater, rated at 0.16 MMBtu/hr;
- (f) One (1) mold shop heater, rated at 0.09625 MMBtu/hr;
- (g) One (1) mold shop heater, rated at 0.04 MMBtu/hr; and
- (h) One (1) air make-up unit, rated at 3.0 MMBtu/hr.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 Operating Permit T085-7186-00070, issued on July 12, 1999;
- (b) First Reopening to Part 70 Operating Permit R 085-13348-00070, issued on January 30, 2002; and
- (c) First Administrative Amendment AA 085-16182-00070, issued on October 22, 2002.

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

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) Part 70 permit (T085-7186-00070), Condition D.1.1, 326 IAC 8-1-6 (BACT) limit:

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

Pursuant to the Best Available Control Technology (BACT) analysis presented as part of this application:

- (a) This facility shall use less than 725.5 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 197.1 tons per year to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).
- (b) the following work practices have been determined to be BACT for the three (3) spray guns:
- (1) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
 - (2) proper testing of spray guns prior to daily use;
 - (3) proper equipment clean-up and maintenance;
 - (4) all resins and gelcoats will be applied with air assisted airless spray applicators;
 - (5) spray cleaners will be cleaned with acetone;
 - (6) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (7) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
 - (8) the overspray shall be minimized by spraying as close as practical into the molds;
 - (9) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;
 - (10) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
 - (11) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) The allowable VOC emissions from the gel coat spray guns (EU AA) will be 6.4 tons per month, based on 14.7% flash off for non vapor suppressed (NVS) gel coat. The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 10.03 tons per month, based on 7.0% flash off for non vapor suppressed (NVS) resin.

The BACT analysis and emissions calculations were based on:

- (1) The gel coating used had a styrene concentration of 33% or less and a flash off of 14.7%.
- (2) The resin coating used had a styrene concentration of 35% or less and a flash off of 7.0%
- (3) The mold release coating had a VOC concentration of 98% or less.

- (4) The catalyst used had a VOC concentration of 49% or less.
- (d) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for a each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (e) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

Reason for revision: Since the 1998 CFA emission factors have been superseded with the July 23, 2001 Unified Emission Factors (UEF) for Open Molding of Composites, the emission factors included in the BACT analysis will be revised through this renewal and will not be considered a re-opening of BACT since all VOC emission limits will remain unchanged. The 1998 emission factors are no longer referenced. The revised condition is included as condition D.1.1 of the Part 70 Permit renewal.

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

- (a) Part 70 permit (T085-7186-00070), Condition D.3.1, Particulate Matter (PM)

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the natural gas combustion sources with a heat input equal to or less than 10 mmBtu/hr shall be limited to 0.6 pounds per mmBtu heat input.

Reason not incorporated: This source does not have any boilers or other sources of indirect heating. None of the combustion units at this source are indirect heating units.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) The two (2) Resin Chop spray guns, identified as EU BB and CC, each using dry filters for particulate emissions control, are subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM) because they are each a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM10. These units are not "large units" as described in 40 CFR 64.5.

Pursuant to 40 CFR 64.5(b), the Permittee was required to submit a CAM plan as part of the Title V renewal application. The Permittee did not submit a CAM plan with the Title V renewal application submitted on July 31, 2003.

- (d) IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Kosciusko County has been classified as 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.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (c) Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other 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.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) 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 emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

HAPs	tons/year
Styrene	greater than 10
Total	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC is equal to or greater than 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 all other criteria pollutants are less than 100 tons per year.
- (c) 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 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
PM2.5	0.0
PM-10	0.0
SO ₂	Not reported
VOC	36.0
CO	Not reported
NO _x	Not reported
HAP	Not reported

Part 70 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 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
EU AA, BB, and CC	3.45	3.45	0.0	197.10	0.0	0.0	191.30 (Styrene)	197.10
Mold Shop (MS)	0.04	0.04	0.0	2.18	0.0	0.0	2.03 (Styrene)	2.18
EU EE, DD, FF, GG, HH, II, and JJ	0.54	0.54	0.0	0.0	0.0	0.0	0.0	0.0
Natural Gas Combustion	0.03	0.13	0.01	0.10	1.48	1.76	0.03 (Hexane)	0.03
Total PTE	4.06	4.16	0.01	199.38	1.48	1.76	193.33 (Styrene)	199.31

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

- (a) This source does include a pollutant-specific emissions unit as defined in 40 CFR 64.1 for particulate matter:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for particulate matter,
 - (2) that is subject to an emission limitation or standard for particulate matter, 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 the two (2) resin chop spray guns, EU BB and CC, at this source.

- (b) The the two (2) Resin Chop spray guns, identified as EU BB and CC, each are not a “large unit” as described in 40 CFR 64.5. Therefore, the owner or operator was required to submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application. The Permittee did not submit a CAM plan with the Title V renewal application submitted on July 31, 2003. IDEM is reviewing this matter and will take appropriate action.

The compliance monitoring requirements applicable to the two (2) Resin Chop spray guns, identified as EU BB and CC, each using dry filters for particulate emissions control, which shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements, are as follows:

- (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 (S/V A and B) 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.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.5780, Subpart WWWW) because this source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Therefore, the requirements of *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*, (40 CFR 63.5780, Subpart WWWW) are included in the permit.

Construction of this source commenced prior to August 2, 2001. Therefore, this is an existing affected source. The processes currently existing at this source subject to the rule include open molding, cleaning of equipment used in reinforced plastic composites manufacture, and HAP-containing materials storage. The specific facilities include the following:

- (a) Four (4) Gel Spray Guns, identified as Emission Unit (EU) AA, rated at 148 pounds per hour, consisting of three (3) Glasscraft Model No. LPA2-100 and one (1) Magnum VRP 1000, (spraying only one color at a time) utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to one stack identified as S/V C, installed in 1995;

- (2) Two (2) Magnum VRP 1000, Resin Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, utilizing mechanical non-atomized fluid impingement spray, with dry filters for particulate control, and exhausting to two (2) stacks identified as S/V A and B, installed in 1995; and
- (3) One (1) Mold Shop, identified as MS, consisting of resin spray guns and gel coat spray guns, utilizing mechanical non-atomized fluid impingement spray for resins and an HVLP cup spray gun for gel coat, with dry filters for particulate control, and exhausting through one (1) wall vent, installed in 2000.

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

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785(a)
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799(b) and (c)
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805(b) and (g)
- (11) 40 CFR 63.5810
- (12) 40 CFR 63.5835(a) and (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860(a)
- (15) 40 CFR 63.5895(b), (c) and (d)
- (16) 40 CFR 63.5900(a)(2)(3)(4), (b) and (c)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910(a), (b), (c), (d), (g), (h) and (i)
- (19) 40 CFR 63.5915(a), (c) and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 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.

State Rule Applicability - Entire 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 under 326 IAC 2-7 (Part 70). Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1. Therefore, the next emission statement for this source must be submitted by July 1, 2008. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, originally constructed in 1995, is not one of the 28 listed source categories under this rule, and is not a major PSD source because the potential to emit of all regulated pollutants, except PM, PM10 and VOC, is less than 250 tons per year. PM emissions from the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed 56.85 pounds per hour. PM10 emissions from the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop shall not exceed 56.85 pounds per hour. This will limit source wide emissions of PM and PM10 each to less than 250 per year. Compliance with 326 IAC 8-1-6 will limit VOC emission to less than 250 tons per year. Therefore, this source is not subject to this rule. There have been no major modifications made to the source and the source remains a minor PSD source.

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 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2 (1), (2), or (3).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, constructed after July 27, 1997, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Each of the facilities at this source, except for the Mold Shop, were constructed prior to the July 27, 1997 applicability date, therefore, the requirements of this rule do not apply to these facilities. The Mold Shop does not have the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs. Therefore, the requirements of this rule do not apply to the Mold Shop.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2(d) (Particulate Emission Limitations for Surface Coating, Reinforced Plastics Composites Fabricating Manufacturing Processes, and Graphic Arts Manufacturing Processes)

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable.

Pursuant to this rule, the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop, at all times when the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel spray guns in the Mold Shop are in operation.

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

Pursuant to 326 IAC 6-3-1(b)(14), the two (2) Circular Saws, identified as EU DD and EE, the two (2) Grinders, identified as EU FF and GG, the two (2) small chop saws, identified as HH, the one (1) radial saw, identified as JJ, and the one (1) table saw, identified as II, are not subject to the requirements to 326 IAC 6-3-2 because they each have potential PM emissions less than 0.551 pounds per hour.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to new facilities, constructed after January 1, 1980, which have potential emissions of 25 tons or more per year of VOC. The fiberglass operations are subject to this rule since potential VOC emissions are greater than 25 tons per year. Pursuant to T085-7186-00070, issued on July 12, 1999, and First Administrative Amendment No. 085-16182-00070, issued on October 22, 2002, and as updated in this Part 70 renewal to incorporate updated emission factors for calculating VOC emissions from gel coat and resin and to change the monthly VOC limits to twelve (12) consecutive month limits, BACT for the four (4) gel spray guns, identified as EU AA, and the two (2) resin spray guns, identified as EU BB and CC is the following:

- (a) The Permittee shall limit the use of all gel coats, resins, catalysts, and mold release to EU AA, BB and CC, such that the potential to emit of VOC is limited to less than 197.1 tons per 12 consecutive month period to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).
- (b) the following work practices have been determined to be BACT for the five (5) spray guns:
 - (1) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
 - (2) proper testing of spray guns prior to daily use;
 - (3) proper equipment clean-up and maintenance;
 - (4) all resins and gelcoats will be applied with air assisted airless spray applicators;
 - (5) spray cleaners will be cleaned with acetone;
 - (6) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (7) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
 - (8) the overspray shall be minimized by spraying as close as practical into the molds;
 - (9) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;

- (10) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
 - (11) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) The allowable VOC emissions from the gel coat spray guns (EU AA) will be 76.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 120.36 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The BACT analysis and emissions calculations were based on:

- (1) The gel coating used had a styrene concentration of 33% or less.
- (2) The resin coating used had a styrene concentration of 35% or less.
- (3) The mold release coating had a VOC concentration of 98% or less.
- (4) The catalyst used had a VOC concentration of 49% or less.

Note: Although the emission calculations for BB and CC in this renewal were based on a resin coating with a styrene content of 36%, the source will still comply with the VOC emissions limits in paragraph (c) above.

- (d) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded.

The Mold Shop resin and gel spray guns are not subject to the requirements of this rule because the potential to emit of VOC is less than 25 tons per year.

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This source is not subject to the requirements of 326 IAC 20-25-3 because it is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 20-25-1(d), since this source is subject to 326 IAC 20-56, concerning emission standards for hazardous air pollutants from reinforced plastic composites production, it is exempt from this rule after April 21, 2006, because it is a major source that existed on or before August 2, 2001. Therefore, the requirements of this rule no longer apply.

326 IAC 20-56 (Reinforced Plastic Composites Production)

This rule incorporates by reference 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. Therefore, this rule applies to sources as provided in 40 CFR 63.5785, Subpart WWWW. The requirements of 40 CFR 63, Subpart WWWW are included in Conditions D.1.13 and D.1.14 of the permit. See the Federal Rule Applicability for the applicable requirements.

Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following operator training requirements:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

- (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

Compliance Determination and Monitoring Requirements

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

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

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

- (a) The four (4) gel spray guns, identified as EU AA, the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel coat spray guns in the Mold Shop 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 (S/V A, B, and C) and the wall vent for the Mold Shop 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 dry filters for the four (4) gel spray guns, identified as EU AA, the two (2) resin spray guns, identified as EU BB and CC, and the resin and gel coat spray guns in the Mold Shop must operate properly to be able to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Surface Coating, Reinforced Plastics Composites Fabricating Manufacturing Processes, and Graphic Arts Manufacturing Processes) and 326 IAC 2-7 (Part 70). Also, the dry filters for the two (2) resin spray guns, identified as EU BB and CC, must operate properly to be able to comply with 40 CFR 64, CAM.

- (b) The two (2) Circular Saws, identified as EU DD and EE, the two (2) Grinders, identified as EU FF and GG, do not have applicable compliance monitoring conditions because they vent fugitively within the building and filtered air from the control device is re-circulated into the grinding booth, where the units are located. The two (2) small chop saws, identified as HH, the one (1) radial saw, identified as JJ, and the one (1) table saw, identified as II because they are uncontrolled and vent fugitively within the building.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit renewal application for the purposes of this review was received on July 31, 2003. Additional information received on July 20, 2004 and September 26, 2005 makes the Part 70 permit application administratively complete.

Conclusion

The operation of this fiberglass tub and shower manufacturing operation shall be subject to the conditions of this Part 70 permit 085-17770-00070.

Appendix A: Emission Calculations

Company Name: Front Line Manufacturing, Incorporated
Address City IN Zip: 306 School Street, Leesburg, IN 46538
Permit Number: T085-17770-00070
Reviewer: Juila Handley/EVP

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Gel coat and Resin Chop Spray Guns (AA, BB, CC)	Mold Shop (MS)	Circular Saws (DD, EE, and FF)	TOTAL
PM	0.03	344.69	5.97	1.24	351.93
PM10	0.13	344.69	5.97	1.24	352.04
SO2	0.01	0.00	0.00	0.00	0.01
NOx	1.76	0.00	0.00	0.00	1.76
VOC	0.10	256.04	2.18	0.00	258.32
CO	1.48	0.00	0.00	0.00	1.48
total HAPs	0.03	256.04	2.18	0.00	258.25
worst case single HAP	(hexane) 0.032	(styrene) 248.50	(styrene) 2.03	0.00	(styrene) 250.53
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Gel coat and Resin Chop Spray Guns (AA, BB, CC)	Mold Shop (MS)	Circular Saws & Grinders (DD, EE, FF, and GG)	TOTAL
PM	0.03	3.45	0.04	0.54	4.06
PM10	0.13	3.45	0.04	0.54	4.16
SO2	0.01	0.00	0.00	0.00	0.01
NOx	1.76	0.00	0.00	0.00	1.76
VOC	0.10	197.10	2.18	0.00	199.37
CO	1.48	0.00	0.00	0.00	1.48
total HAPs	0.03	197.10	2.18	0.00	199.31
worst case single HAP	(hexane) 0.032	(styrene) 191.30	(styrene) 2.03	0.00	(styrene) 193.33
Total emissions based on rated capacity at 8,760 hours/year, after control.					

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage**

Company Name: Front Line Manufacturing, Inc.
Address City IN Zip: 306 School Street, Leesburg, IN 46538
Permit Number: T085-17770-00070
Reviewer: Julia Handley/EVP

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer (as styrene) or total VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC** &HAP (as styrene or MMA) (pounds per day)	Potential VOC & HAP (as styrene or MMA)** (tons per year)	Transfer Efficiency	Potential PM/PM10 (tons/year)
AA	Gel Coat	10.25	30.0%	1.61	13	169.36	436.49	79.66	90%	65.85
	Catalyst	8.94	3.0%	0.0268	13	n/a	2.24	0.41	90%	1.32
	mold release	7.25	98.0%	0.0120	13	n/a	26.60	4.85	100%	0.00
BB	Resin	8.83	36.0%	6.42	9	80.00	462.58	84.42	90%	135.07
	Catalyst	8.94	3.0%	0.1142	9	n/a	6.25	1.14	90%	3.69
CC	Resin	8.83	36.0%	6.42	9	80.00	462.58	84.42	90%	135.07
	Catalyst	8.94	3.0%	0.1142	9	n/a	6.25	1.14	90%	3.69
MS	Tooling Gel (styrene monomer emissions)	9.83	36.9%	3.22	0.04	377.00	5.73	1.05	40%	2.10
	Tooling Gel (MMA monomer emissions)	9.83	3.0%	3.22	0.04	45.00	0.68	0.12	40%	3.23
	Catalyst	8.94	3.0%	0.0536	0.04	n/a	0.01	0.00	40%	0.05
	Production Resin	8.83	36.0%	12.8400	0.04	80.00	4.35	0.79	96%	0.47
	Catalyst	8.94	3.0%	0.2284	0.04	n/a	0.06	0.01	96%	0.01
	Tooling Resin	8.84	46.8%	3.0000	0.04	80.00	1.02	0.19	96%	0.09
	Catalyst	8.94	3.0%	0.2284	0.04	n/a	0.06	0.01	96%	0.01
Total Potential to Emit:							1414.91	258.22		350.66
						PM Control Efficiency %		Limited VOC (tons/yr)		Controlled PM (tons/yr)
	AA, BB, CC					99.00%		197.10		3.45
	MS					99.30%		2.18		0.04
	Total							199.28		3.49

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application. This source uses mechanical application consisting of non-atomized fluid impingement applicators (no VSR).

** Catalyst & mold release is VOC only (i.e., no HAP as styrene).

METHODOLOGY

For gel and resin in AA, BB, and CC, all the monomer is styrene. For gel in MS, both styrene and MMA monomer is present.

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (July 23, 2001) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content determined using the 7/2001 UEF Table.

Potential VOC Pounds per Hour = Density (lb material/gal) * Gal of Material (gal material/unit) * Maximum usage (units/ hr) x [UEF Emission Factor (lb styrene/ton resin or gelcoat)/2000 lbs material, or wt. % VOC]

Potential VOC Emissions (lb/day) = Potential VOC Emissions (lb/hr) x 24 (hr/day)

Potential VOC Emissions (tons/yr) = (Potential VOC Emissions (lb/hr) x 8,760 (hr/yr)) / 2,000 (lb/ton)

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage**

Company Name: Front Line Manufacturing, Inc.
Address City IN Zip: 306 School Street, Leesburg, IN 46538
Permit Number: T085-17770-00070
Reviewer: Julia Handley/EVP

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	Weight% Lead Cmpds.	Weight% Toluene	Weight% Dimethyl phthalate	Weight% Antimony Cmpds.	Weight% Chromium Cmpds.	Weight% Cobalt Cmpds.	Weight% Xylene	Lead Cmpd. Emissions (tons/yr)	Toluene Emissions (tons/yr)	Dimethyl phthalate Emissions* (tons/yr)	Antimony Cmpd. Emissions (tons/yr)	Chromium Cmpd. Emissions (tons/yr)	Cobalt Cmpd. Emissions (tons/yr)	Xylene Emissions (tons/yr)	Total HAP Emissions (tons/yr)**	
AA	Gel Coat	10.25	1.61	13	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	79.66
	Catalyst	8.94	0.0268	13	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	mold release	7.25	0.0120	13	0.0%	88.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	4.36	0.00	0.00	0.00	0.00	0.00	0.00	4.36
BB	Resin	8.83	6.42	9	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	84.42
	Catalyst	8.94	0.1142	9	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CC	Resin	8.83	6.42	9	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	84.42
	Catalyst	8.94	0.1142	9	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MS	Tooling Gel	9.83	3.22	0.04	2.2%	0.0%	0.0%	1.0%	0.4%	0.02%	0.0%	0.12	0.00	0.00	0.06	0.02	0.00	0.00	0.00	1.37
	Catalyst	8.94	0.0536	0.04	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.1%	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.03
	Production Resin	8.83	12.8400	0.04	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.79
	Catalyst	8.94	0.2284	0.04	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.1%	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.14
	Tooling Resin	8.84	3.0000	0.04	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.19
	Catalyst	8.94	0.2284	0.04	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%	0.1%	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.14
												0.12	4.36	0.29	0.06	0.02	0.01	8.0E-04	255.53	

* Based on information from the catalyst manufacturer, over 99% of dimethyl phthalate is consumed in the reaction with the residual emitted in the form of MEK which is no longer a HAP.

** Total HAP emissions include styrene and MMA emissions from gel coat and resin calculated on page 2.

METHODOLOGY

Potential HAP Emissions (tons/yr) = Density (lb material/gal) * Gal of Material (gal material/unit) * Maximum usage (units/ hr) x wt. % HAP x 8,760 (hr/yr) / 2,000 (lb/ton)

Total HAP emissions include styrene emissions from gel coat and resin calculated on previous page.

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

Company Name: Front Line Manufacturing, Inc.
Address City IN Zip: 306 School Street, Leesburg, Indiana 46538
Permit Number: T085-17770-00070
Reviewer: Julia Handley/EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.0

35.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.03	0.13	0.01	1.76	0.10	1.48

*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 next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
PM and PM10 Generated from Sawing/Cutting**

Company Name: Front Line Manufacturing, Inc.
Address City IN Zip: 306 School Street, Leesburg, Indiana 46538
Permit Number: T085-17770-00070
Reviewer: Julia Handley/EVP

Emission Unit	Maximum Rate (lb/hr)	Emission Factors (lb/ton)		Emission Rate (lbs/hr)		Maximum Uncontrolled Emissions (tons/yr)		Maximum Controlled Emissions (tons/yr)	
		PM	PM10	PM	PM10	PM	PM10	PM	PM10
DD	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
EE	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
FF	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
GG	231	0.35	0.35	0.04	0.04	0.18	0.18	0.002	0.002
HH	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
II	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
JJ	231	0.35	0.35	0.04	0.04	0.18	0.18	0.18	0.18
Total:						1.24	1.24	0.54	0.54

Note: Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
 Controlled emissions based on cartridge filter system control efficiency of 99%.