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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Emtec Composites, Inc.  
110 Windsor Avenue  
Elkhart, Indiana 46514**

(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 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.**

Operation Permit No.: T039-18085-00531	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 6, 2004  Expiration Date: April 6, 2009



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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)]

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The Permittee owns and operates a stationary gelcoat application and finishing of fiberglass products plant.

Responsible Official:	President
Source Address:	110 Windsor Avenue, Elkhart, Indiana 46514
Mailing Address:	110 Windsor Avenue, Elkhart, Indiana 46514
General Source Phone Number:	(574) 206-0077
SIC Code:	3088
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act Not in 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)]

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

- (a) One (1) resin casting mold shop or chop area (identified as A1), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility was constructed in 1999.
- (b) One (1) gel coat spray area (identified as B1), with a maximum throughput rate of 14.3 pounds of gelcoat per hour using four (4) non-atomized guns, controlled by dry filters, and exhausting at stack 1. This facility was constructed in 1999.
- (c) One (1) grinding facility with a maximum throughput rate of fifteen (15) pounds of fiberglass products per hour. This facility was constructed in 1999.
- (d) One (1) resin casting mold shop or chop area (identified as A2), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility will be constructed in 2003.
- (e) One (1) gel coat spray area (identified as B2), with a maximum throughput rate of 14.3 pounds of gelcoat per hour, using four (4) non-atomized gel coat guns, controlled by dry filters, and exhausting at stack 1. This facility will be constructed in 2003.
- (f) One (1) final finish area (identified as B3) using HVLP spray gun, with a maximum throughput rate of five (5) pounds of gelcoat per hour, and exhausting at stack 2. This facility will be constructed in 2003.

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

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

Other activities with PM emissions equal to or less than 5 pounds per hour and 25 pounds per day, consisting of three (3) sanders, with combined throughput of two (2) pounds of fiberglass products per hour [326 IAC 6-3].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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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]

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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]

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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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.5 Severability [326 IAC 2-7-5(5)]

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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)]

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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)]

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- (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)]

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- (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 a 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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) 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 the 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: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office  
Telephone Number: 219-245-4870  
Facsimile Number: 219-245-4877

- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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) 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 deviation from 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 in

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]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

**B.14** 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.15** 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 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.16 Permit Renewal [326 IAC 2-7-4]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete 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.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 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.19 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 emissions allowable under 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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.

#### B.20 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.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]

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.22 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.23 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, I/M & Billing Section), to determine the appropriate permit fee.

B.24 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.

## 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 [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to [40 CFR 52 Subpart P], particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.
- 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 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification

requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

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

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

**C.12 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.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.15 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] [326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (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 purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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

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- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 FACILITY OPERATION CONDITIONS

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

- (a) One (1) resin casting mold shop or chop area (identified as A1), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility was constructed in 1999.
- (b) One (1) gel coat spray area (identified as B1), with a maximum throughput rate of 14.3 pounds of gelcoat per hour using four (4) non-atomized guns, controlled by dry filters, and exhausting at stack 1. This facility was constructed in 1999.
- (d) One (1) resin casting mold shop or chop area (identified as A2), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility will be constructed in 2003.
- (e) One (1) gel coat spray area (identified as B2), with a maximum throughput rate of 14.3 pounds of gelcoat per hour, using four (4) non-atomized gel coat guns, controlled by dry filters, and exhausting at stack 1. This facility will be constructed in 2003.
- (f) One (1) final finish area (identified as B3) using HVLP spray gun, with a maximum throughput rate of five (5) pounds of gelcoat per hour, and exhausting at stack 2. This facility will be constructed in 2003.

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

### Construction Conditions

#### General Construction Conditions

##### D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

##### D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

##### D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

#### Emissions Limitation and Standards

##### D.1.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.5 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

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- (a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:
- (1) One (1) resin casting mold shop (identified as A1).
  - (2) One (1) gel coat spray area (identified as B1)
  - (3) One (1) resin casting mold shop (identified as A2)
  - (4) One (1) gel coat spray area (identified as B2).
  - (5) One (1) final finish area (identified as B3)
- (c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are incorporated by reference.

D.1.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

D.1.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

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Pursuant to 40 CFR 52 Subpart P, the particulate emissions from the fiberglass operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
 P = process weight rate in tons per hour

**D.1.8 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]**

Pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content Weight Percent
<b>Resin, Manual or Mechanical Application</b>	
Production-Speciality Products	48 *
Production-Non-corrosion Resistant Unfilled	35 *
Production-Non-corrosion Resistant Filled (>35 % by weight)	38
Production, Non-corrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60 *
Shrinkage Controlled	52
Tooling	43
<b>Gel Coat Application</b>	
Production -Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI <sup>a</sup>	45
Production-Clear, subject to ANSI <sup>a</sup> Standards	50

<sup>a</sup> American National Standards Institute.

\* Categories that must use mechanical non-atomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.15(a) is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using non-atomized application to apply resins or gelcoats within a category that does not require non-atomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be

calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

**For Averaging within a category:**

▪  $Em_A \leq (M_R * E_a)$

Where:

$M_R$  = Total monthly mass of material within each category

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

*Units: mass = tons*  
*emission factor = lbs of monomer per ton of resin or gel coat*  
*emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical non-atomized application technology or manual application:

- (1) Production non-corrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Non-atomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
  - (1) Non-atomized application technology.
  - (2) Air-assisted airless.
  - (3) Airless.
  - (4) High volume, low pressure (HVLP).
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
  - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
  - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
  - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.1.9 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
  - (1) All production and tooling resins that contain HAPs.
  - (2) All production and tooling gel coats that contain HAPs.
  - (3) Waste resins and gel coats that contain HAPs.
  - (4) Cleaning materials, including waste cleaning materials.

- (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.10 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) 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.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
  - (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.

D.1.11 Particulate [326 IAC 6-3-2(d)]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the fiberglass operations shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.12 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 this facility and its control device.

## Compliance Determination Requirements

### D.1.13 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

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Compliance with the HAP monomer content limitations in Condition D.1.8 shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:
  - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (4) An alternate method approved by IDEM, OAQ.

## Compliance Monitoring Requirements

### D.1.14 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Record Keeping and Reporting Requirements

### D.1.15 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.8, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations

- necessary to verify the type, amount used, and HAP content of each resin or gel coat;
- (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.10, 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 Conditions D.1.7 and D.1.14, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements [40 CFR 63, Subpart WWWW]

- (a) To comply with Condition D.1.5, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) immediately.
  - (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
  - (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
  - (4) If complying by using an add-on control device, the Permittee shall submit:
    - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
    - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) The notifications required by paragraph (a) shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

D.1.17 Reporting Requirements [326 IAC 20-25-3]

If the Permittee uses monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.8(a), the Permittee shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) grinding facility with a maximum throughput rate of fifteen (15) pounds of fiberglass products per hour. This facility was constructed in 1999.

### Insignificant Emission Units:

Other activities with PM emissions equal to or less than 5 pounds per hour and 25 pounds per day, consisting of three (3) sanders, with combined throughput of two (2) pounds of fiberglass products per hour [326 IAC 6-3].

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

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

#### D.2.1 Particulate [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. Therefore, the grinding facility and three (3) sanders shall each not exceed 0.551 pounds per hour.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Emtec Composites, Inc.  
Source Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Mailing Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-18085-00531

**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  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Emtec Composites, Inc.  
Source Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Mailing Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-18085-00531

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
---

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Emtec Composites, Inc.  
Source Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Mailing Address: 110 Windsor Avenue, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-18085-00531

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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:**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**issued April 6, 2004**

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

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

**Source Background and Description**

Source Name:	Emtec Composites, Inc.
Source Location:	110 Windsor Avenue, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3088
Operation Permit No.:	T039-18085-00531
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Emtec Composites, Inc. relating to the operation of a fiberglass products manufacturing plant.

This Part 70 permit contains provisions intended to satisfy the requirements of the construction permit rules.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) resin casting mold shop or chop area (identified as A1), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility was constructed in 1999.
- (b) One (1) gel coat spray area (identified as B1), with a maximum throughput rate of 14.3 pounds of gelcoat per hour using four (4) non-atomized guns, controlled by dry filters, and exhausting at stack 1. This facility was constructed in 1999.
- (c) One (1) grinding facility with a maximum throughput rate of fifteen (15) pounds of fiberglass products per hour. This facility was constructed in 1999.

**Unpermitted Emission Units and Pollution Control Equipment**

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

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

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (d) One (1) resin casting mold shop or chop area (identified as A2), with a maximum throughput rate of 64.3 pounds of resins per hour, using one (1) non-atomized gun, and exhausting at stack 1. This facility will be constructed in 2003.

- (e) One (1) gel coat spray area (identified as B2), with a maximum throughput rate of 14.3 pounds of gelcoat per hour, using four (4) non-atomized gel coat guns, controlled by dry filters, and exhausting at stack 1. This facility will be constructed in 2003.
- (f) One (1) final finish area (identified as B3) using HVLP spray gun, with a maximum throughput rate of five (5) pounds of gelcoat per hour, and exhausting at stack 2. This facility will be constructed in 2003.

### Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, consisting of the following units:
  - (1) One (1) open flamed forced-air unit with a maximum heat input capacity of 0.2 MMBtu per hour;
  - (2) One (1) air make-up unit with a maximum heat input capacity of 0.3 MMBtu per hour; and
  - (3) One (1) air make-up unit with a maximum heat input capacity of 0.3 MMBtu per hour.
- (b) Other activities with PM emissions equal to or less than 5 pounds per hour and 25 pounds per day, consisting of three (3) sanders, with a combined throughput of two (2) pounds of fiberglass products per hour [326 IAC 6-3].

### Existing Approvals

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

- (a) FESOP 039-12276-00531, issued on August 21, 2000.
- (b) First Administrative Amendment 039-14895-00531, issued on September 28, 2002.
- (c) Second Administrative Amendment 039-15618-00531, issued on May 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 determined no longer applicable; and were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) All FESOP conditions.

Reason not incorporated: The source transitioned to a TV permit; therefore, the FESOP limits are no longer applicable.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on August 25, 2003. Additional information was received on October 17, 2003.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 9).

**Potential To Emit**

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	96.4
PM10	96.4
SO <sub>2</sub>	0.002
VOC	45.4
CO	0.29
NO <sub>x</sub>	0.35

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Xylene	0.13
Toluene	0.23
Styrene	38.3
MEK	0.35
MMA	3.77
Dimethylphthalate	0.30
Light Petroleum Distillate	1.61
Total	44.7

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) **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.

**Actual Emissions**

No previous emission data has been received from the source.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Emission Units	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Natural Gas Fired Combustion Units	0.03	0.03	0.002	0.02	0.29	0.35	negligible
Fiberglass Operation Line 1 (including gelcoat application, resin casting)	35.5	35.5	0.00	18.5	0.00	0.00	36.9
Fiberglass Operation Line 2 (including gelcoat application, and resin casting)	35.5	35.5	0.00	18.5	0.00	0.00	
Mold Preparation	19.7	19.7	0.00	2.74	0.00	0.00	2.06
Final Finish Area	5.67	5.67	0.00	5.70	0.00	0.00	5.70
Grinding/Sanding	7.0E-04	3.2E-04	0.00	0.00	0.00	0.00	0.00
Total PTE From the Entire Source	96.4	96.4	0.002	45.4	0.29	0.35	44.7

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 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.

### 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.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT (April 21, 2006,) that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) immediately.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

- (4) If complying by using an add-on control device, the Permittee shall submit:
- (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
  - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
  - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPS)(326 IAC 14 and 40 CFR 63) applicable to this source.

- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is subject to National Emission Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR 63.5780, Subpart WWWW (Reinforced Plastics Composites Production(326 IAC 14)), which was promulgated on March 5, 2003.
- (d) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

This source does not contain any units that emit equal to or greater than 100 tons per year and that require the use of a control device to achieve compliance with an emission limitation. Therefore, 40 CFR 64 is not applicable.

#### **State Rule Applicability - Entire Source**

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

This source was constructed in 1999 and is not in one (1) of twenty-eight (28) source categories. At construction, the source had a potential to emit for all criteria pollutants that was less than the PSD major source threshold of 250 tons per year, and modifications undertaken since the initial construction have not increased the potential to emit to greater than 250 tons per year. The source submitted an application on August 25, 2003 requesting the construction of a resin casting mold shop (A2), a gelcoat spray area (B2), and a final finish area (B3). After these modifications, the potential to emit of all criteria pollutants from the entire source will remain less than 250 tons per year. Therefore, this source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart county. Pursuant to this rule, the Permittee must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**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 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.

**State Rule Applicability - Fiberglass Operations**

**326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)**

The two (2) gelcoat spray areas, two (2) resin casting mold shops and one (1) final finish facility are subject to the requirements of 326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units) because the potential to emit is greater than ten (10) tons per year for an single HAP and greater than twenty-five (25) tons per year for any combination of HAPs; and the source manufactures reinforced plastics composites parts.

Pursuant to 326 IAC 20-25-3, the two (2) gelcoat spray areas, two (2) resin casting mold shops and one (1) final finish facility shall comply with the following conditions:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products	HAP Monomer Content (Weight %)
Resin, Manual or Mechanical Application	
Production-Speciality Products	48*
Production-Non-corrosion Resistant Unfilled	35*
Production-Non-corrosion Resistant Filled (greater than or equal to 35% by weight)	38
Production, Non-corrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI <sup>a</sup> Standards	45

Fiber Reinforced Plastics Composites Products	HAP Monomer Content (Weight %)
Production-Clear, subject to ANSI <sup>a</sup> standards	50

a - American National Standards Institute.

\* - Categories that must use mechanical non-atomized application technology or manual as stated in subsection (c).

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

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gel coats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resin and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For averaging within a category

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

Where:

- $M_R$  = Total monthly mass of material within each category (tons).
- $E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category (lbs of monomer per ton of resin or gel coat applied).
- $E_{m_A}$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls (lbs of monomer).

Note: Fillers may not be used when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical non-atomized application technology or manual application:

- (1) Production non-corrosion resistant, unfilled resins from all sources.
- (2) Production, speciality product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Non-atomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
  - (1) Non-atomized application technology.
  - (2) Air-assisted airless.
  - (3) Airless.
  - (4) High volume, low pressure (HVLP).
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
  - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
  - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
  - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in (g), HAP containing materials shall be kept in a closed container when not in use.

- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the followings:
  - (1) All production and tooling resins that contain HAPs.
  - (2) All production and tooling gel coats that contain HAPs.
  - (3) Waste resins and gel coats that contain HAPs.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAPs.
- (g) All resins and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All new personnel shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided by the new employer.
- (e) If the result of an evaluation show that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) 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.
- (g) The Permittee shall maintain the following training records on site and available for inspection and review:
  - (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.

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

Although the operation of this source has the potential to emit equal to or greater than ten (10) tons per year of any single HAP and equal to or greater than twenty-five (25) tons per year of combination of HAPs, this source is not subject to the requirements of 326 IAC 2-4.1 because the source is subject to National Emission Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR 63.5780, Subpart WWWW (Reinforced Plastics Composites Production(326 IAC 14)), which was promulgated on March 5, 2003.

326 IAC 6-3-2 (Process Operations) and 40 CFR 52, Subpart P

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

The source operates two (2) gelcoat spray areas, and two (2) resin casting mold shops, using non-atomized guns.

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from the two (2) gelcoat spray areas, and two (2) resin casting mold shops shall be limited by the following:

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

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

Under the rule revision, the particulate emissions from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential emissions of VOC from each of the two gelcoat spray areas and resin casting mold shops used for gelcoat/resin application, are less than twenty-five (25) tons per year. The two (2) spray areas and resin casting mold shops are considered as two (2) separate lines since the product can go to either of the two (2) areas for gelcoat/resin application. Therefore, the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

**State Rule Applicability - Grinding Facility, Three Sanders**

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

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. Therefore, the grinding facility and three (3) sanders shall each not exceed 0.551 pounds per hour.

## State Rule Applicability - Natural Gas-Fired Combustion Units

There are no specifically applicable regulations that apply to these emission units.

## Testing Requirements

Testing is not required in this permit because the Permittee shall keep monthly records to determine compliance with HAP emission limitations established in this permit.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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:

- (1) The gelcoat and resin operations have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (01, 02, 03 and 04) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry particulate filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 40 CFR 52, Subpart P.

### **Conclusion**

The operation of this gelcoat application and finishing of fiberglass products plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-18085-00531.

**Natural Gas Combustion Only**  
**One (1) Open Flamed Forced Air Unit, Two (2) Air Make up Units**

**Company Name:** Emtec Composites, Inc.

**Address:**

**Title V:** 039-18085

**Plt ID:** 039-00531

**Reviewer:** ERG/SD

**Date:** September 12, 2003

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

0.80 (3 Units total)

7.01

	Pollutant					
	* PM	* PM10	SO <sub>2</sub>	** NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.03	0.03	0.002	0.35	0.02	0.29

\*PM and PM10 er

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**METHODOLOGY**

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/MMCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Natural Gas Combustion Only  
One (1) Open Flamed Forced Air Unit, Two (2) Air Make up Units**

**Company Name:** Emtec Composites, Inc.

**Address:**

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**HAPs - Organics**

	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	7.36E-06	4.20E-06	2.63E-04	6.31E-03	1.19E-05

**HAPs - Metals**

	<b>Lead</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.75E-06	3.85E-06	4.91E-06	1.33E-06	7.36E-06

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
VOC Emissions  
From Fiberglass Operations**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Material	Density (lb/gal)	Weight (%) Styrene/VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Gelcoat/Resin Applied (lbs/hour)	Gelcoat/Resin Applied (tons/hour)	*Emission Rate (lbs Styrene per tons Gelcoat/Resin)	PTE of VOC/Styrene (tons/year)	PTE of PM/PM10 (tons/year)	**Transfer Efficiency
<b>Resin Casting 1</b>										
MSG 1100	9.34	30.0%	19.4	0.354	64.3	0.03	64.2	9.04	29.6	85%
<b>Resin Casting 2</b>										
MSG 1100	9.34	30.0%	19.4	0.354	64.3	0.03	64.2	9.04	29.6	85%
<b>Gel Coat 1</b>										
Vinylester gelcoat in monomer	9.84	37.0%	4.10	0.354	14.3	0.01	232	7.26	5.91	85%
<b>Gel Coat 2</b>										
Vinylester gelcoat in monomer	9.84	37.0%	4.10	0.354	14.3	0.01	232	7.26	5.91	85%
<b>TOTAL (tons/year) =</b>								<b>32.6</b>	<b>71.0</b>	

Note: Norox MEKP-9 is used in resin casting and gelcoat operations. It does not contain any styrene.  
\* Emission rates calculations are based on the Unified Emission Factors for Open Molding Composites (July 23, 2001).  
\*\* Material applied using a mechanical non-atomized application system.

**METHODOLOGY**

Gelcoat/Resin Applied (lbs/hour) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour)  
Gelcoat/Resin Applied (tons/hour) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* 1 ton/2000 lbs  
PTE of VOC/Styrene (tons/year) = Gelcoat/Resin Applied (tons/hour) \* 8760 hours/year \* 1 ton/2000 lbs \* Emission Factor (lbs/ton)  
PTE of PM/PM10 (tons/year) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* (1- Weight % Styrene/VOC) \* (1 - Transfer Efficiency %) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
HAP Emissions  
From Fiberglass Operations**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Dimethylphthalate	Weight % MEK	Weight % MMA	* Emission Rate (lb/ton)	PTE of Dimethylphthalate	PTE of MEK	PTE of MMA
								(ton/year)		
<b>Resin Casting 1</b>										
MSG 1100 - Granite	9.34	19.4	0.354							
Norox MEKP-9	9.17	0.15	0.354	2.4%	2.00%			0.05	0.043	
<b>Resin Casting 2</b>										
MSG 1100 - Granite	9.34	19.4	0.354							
Norox MEKP-9	9.17	0.15	0.354	2.4%	2.00%			0.05	0.043	
<b>Gel Coat 1</b>										
Vinylester gelcoat in monomer	9.84	4.10	0.354			4.00%	60.0			1.88
Norox MEKP-9	9.17	0.29	0.354	2.4%	2.00%			0.10	0.083	
<b>Gel Coat 2</b>										
Vinylester gelcoat in monomer	9.84	4.10	0.354			4.00%	60.0			1.88
Norox MEKP-9	9.17	0.29	0.354	2.4%	2.00%			0.10	0.083	
<b>TOTAL (ton/year) =</b>								<b>0.30</b>	<b>0.25</b>	<b>3.75</b>

\* Emission rate for MMA is based on the Unified Emission Factors for Open Molding Composites (July 23, 2001).

MEK = Methyl Ethyl Ketone  
MMA = Methyl Methacrylate

**METHODOLOGY**

PTE of HAPS (tons/year) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

PTE of MMA (tons/year) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* 1 ton/2000 lbs \* MMA Emission Factor (lbs/ton) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC Emissions**  
**From Cleaning Station and Mold Preparation Area**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	* PTE of PM/PM10 (ton/year)	**Transfer Efficiency
<b>Cold cleaning station</b>															
Acetone	8.86	0%	0%	0%	0%	100%	4.00	0.354	0.00	0.00	0.00	0.00	0.00	19.2	65%
<b>Mold Preparation Area</b>															
2500 All in one glaze	7.70	60.0%	4.00%	56.0%	4.00%	1.00%	0.048	0.354	4.49	4.31	0.07	1.75	0.32	0.08	65%
Sealer glaze	8.75	33.0%	10.0%	23.0%	12.0%	51.0%	0.029	0.354	2.29	2.01	0.02	0.49	0.09	0.09	65%
Mold prep	7.05	100%	0%	100%	0%	0.00%	0.030	0.354	7.05	7.05	0.07	1.77	0.32	0.00	65%
Mold release TR 102	7.00	70%	1.00%	69%	1.00%	25.0%	0.029	0.354	4.88	4.83	0.05	1.17	0.21	0.03	65%
Parts all paste # 2	7.00	68%	2.00%	66%	2.00%	35.0%	0.190	0.354	4.71	4.62	0.31	7.48	1.36	0.23	65%
Sealer TR-100	7.00	70%	1.00%	69.0%	1.00%	25.0%	0.058	0.354	4.88	4.83	0.10	2.36	0.43	0.07	65%
<b>TOTAL (ton/year) =</b>													<b>2.74</b>	<b>19.7</b>	

\* Assume all PM emissions are equal to PM10

\*\* Material applied using HVLP guns

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* 8760 hour/year \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum (unit/hour) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer Efficiency %) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
HAP Emissions  
From Cleaning Station and Mold Preparation Area**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toulene	Weight % Light Petroleum Distillate	Weight % MEK	Xylene PTE	Toulene PTE	Light Petroleum Distillate PTE	MEK PTE
								(ton/year)			
<b>Cold cleaning station</b>											
Acetone	8.86	4.00	0.354								
<b>Mold Preparation Area</b>											
2500 All in one glaze	7.70	0.048	0.354			35.0%				0.20	
Sealer glaze	8.75	0.029	0.354	33%				0.13			
Mold prep	7.05	0.030	0.354		70.0%		30.0%		0.23		0.10
Mold release TR 102	7.00	0.029	0.354								
Parts all paste # 2	7.00	0.190	0.354			68%				1.41	
Sealer TR-100	7.00	0.058	0.354								
<b>TOTAL (ton/year) =</b>								<b>0.13</b>	<b>0.23</b>	<b>1.61</b>	<b>0.10</b>

MEK = Methyl Ethyl Ketone

2.06

**METHODOLOGY**

PTE of HAPS (tons/year) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
PM/PM10 Emissions  
From Grinding and Sanding Facilities**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Material	Max Throughput Rate		* Emission Factor		Potential To Emit	
	(lbs/hour)	(tons/hour)	PM (lbs/ton)	PM10 (lbs/ton)	PM (tons/year)	PM10 (tons/year)
Sanding	2.00	0.001	0.01	0.0045	4.4E-05	2.0E-05
Grinders	30	0.0	0.01	0.0045	6.57E-04	2.96E-04
<b>TOTAL</b>					7.01E-04	3.15E-04

\* Emission factors are from FIRE Volume II, Chapter 14, Grey Iron Foundries - SCC 3-04-003-40 (July, 2001).

**METHODOLOGY**

PTE of PM/PM10 (tons/year) = Max. Throughput Rate (tons/hour) \* Emission Factor (lbs/ton) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
From One (1) Final Finish Area**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Pit ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

Emission Unit	Max. Throughput Rate (lb/hour)	Weight (%) VOC/Styrene	PTE of VOC/Styrene (lbs/hour)	PTE of VOC/Styrene (tons/year)	Weight % MMA	PTE of MMA (tons/year)	* PTE of PM/PM10
Final Finish Area	5.0	26%	1.30	5.69	0.05%	0.01	5.67
				5.69		0.01	5.67

Assume all PM emissions are equal to PM10

\*\* Material applied using a touch-up spray gun

MMA = Methyl Methacrylate

**METHODOLOGY**

PTE of VOC/Styrene (tons/year) = Max. Throughput Rate (lbs/hour) \* Weight % VOC/Styrene \* 8760 hours/year \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Max. Throughput Rate (lbs/hour) \* (1- Weight % VOC/Styrene) \* (1 - Transfer Efficiency %) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Emtec Composites, Inc.  
**Address:** 110 Windsor Avenue, Elkhart, Indiana 46514  
**Title V:** 039-18085  
**Plt ID:** 039-00531  
**Reviewer:** ERG/SD  
**Date:** September 12, 2003

**POTENTIAL TO EMIT OF CRITERIA POLLUTANTS IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>
Combustion Units	0.03	0.03	0.002	0.35	0.02	0.29
Gelcoat application/resin casting Line 1	35.5	35.5			18.5	
Gelcoat application/resin casting Line 2	35.5	35.5			18.5	
Mold Preparation	19.7	19.7			2.74	
Grinding/Sanding	7.0E-04	3.2E-04				
Final Finish Area	5.67	5.67			5.69	
<b>TOTAL</b>	96.4	96.4	0.002	0.35	45.4	0.29

<b>POTENTIAL TO EMIT OF HAPs</b>	<b>TONS PER YEAR</b>
Xylene	0.13
Toluene	0.23
Styrene	38.3
MEK	0.35
MMA	3.77
Dimethylphthalate	0.30
Light Petroleum Distillate	1.61
<b>TOTAL</b>	44.7