INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

April 13, 2004

TO: Interested Parties / Applicant

RE: Fiber-Tron, Inc. / SSM 039-18272-00152

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 9/16/03

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April 13, 2004

Mr. Bill McCaslin
Fiber-Tron, Inc.
29877 US 33 West and 29421 US 33 West
Elkhart, IN 46516

Re: 039-18272
Significant Source Modification to
Part 70 Renewal Permit No.: 039-17561-00152

Dear Mr. McCaslin:

Fiber-Tron, Inc. was issued a Part 70 Renewal Permit on January 26, 2004, for the operation of a stationary van and recreational vehicle fiberglass parts manufacturing source. An application to modify the source was received by the Office of Air Quality (OAQ) on December 1, 2003. The modification will result in the installation of three (3) gel coating stations, two (2) lamination stations, two (2) trimming stations and two (2) adhesive stations. Pursuant to 326 IAC 2-7-10.5(f)(6), the following emission units are approved for construction at the source:

(a) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

(b) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;

(c) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels with a maximum throughput of 247 pounds of fiberglass product per hour; and

(d) Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of non-HAP adhesive per hour exhausting through general ventilation.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval 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.

3. Effective Date of the Permit
   Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the significant source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-12(d) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Seema Roy, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3419, or in Indiana at 1-800-451-6027.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SR / EVP

cc: File – Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Fiber-Tron, Inc.
29877 US 33 West and 29421 US 33 West
Elkhart, Indiana 46516

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

1st Significant Source Modification No.: 039-18272-00152	Pages Modified: 5, 5a, 6, 22, 24, 24a and 31-34
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: April 13, 2004

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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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary van and recreational vehicle fiberglass parts manufacturing source.

Responsible Official:	President
Source Address:	29877 US 33 West and 29421 US 33 West, Elkhart, Indiana 46516
Mailing Address:	29877 US 33 West and 29421 US 33 West, Elkhart, Indiana 46516
General Source Phone Number:	(574) 294-8545
SIC Code:	3714
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This stationary van and recreational vehicle fiberglass parts manufacturing source consists of two (2) plants:

(a) Plant 1 is located at 29877 US 33 West, Elkhart, Indiana 46516; and

(b) Plant 2 is located at 29421 US 33 West, Elkhart, Indiana 46516.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 Permit Renewal.

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

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

(a) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only;

(b) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

(c) One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production;

(d) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;

(e) One (1) trimming station, installed in 1987, rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1;

(f) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels and one (1) cartridge type filter system for particulate matter control, with a maximum throughput of 247 pounds of fiberglass product per hour.

(g) One (1) paint spray booth, installed in 1987, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with a high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(h) Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of HAP free adhesive per hour exhausting through general ventilation.

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

This stationary source also includes the following insignificant activities 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) British thermal units (Btu) per hour:

(1) Two (2) 150,000 Btu/hr tube heaters;

(2) One (1) 600,000 Btu/hr Thermocycler heater; and

(3) Six (6) natural gas radial heaters, each with a maximum heat input rate of 0.175 mm Btu per hour and two (2) natural gas radial heaters, each with a maximum heat input rate of 0.2 mm Btu per hour;

(b) Volatile organic compound (VOC) or hazardous air pollutant (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(d) Solvent recycling systems with batch capacity less than or equal to 100 gallons;

(e) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius);

(f) Mold construction area in plant 1, utilizing one (1) portable air assisted airless gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable air assisted airless fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour.

(g) Mold construction area in plant 2, utilizing a hand lay-up application, emitting less than three (3) pounds per hour or fifteen (15) pounds per day of volatile organic compounds~~;~~, one (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour.

(h) Paint mixing and storage room;

(i) Miscellaneous trim/sanding equipment with no dust collection system; and

(j) Four (4) hand sanders and one (1) table saw in plant 2; and

(k) One mold shop using one (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour as well as hand lay-up. The VOC emissions from this process will remain at a rate less than 15 pounds per day.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

(1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, 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).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source 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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only;

(b) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

(c) One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production;

(d) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;

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

Emission Limitations and Standards

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart 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.

D.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

(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.

(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:

(1) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only.

(2) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change.

(3) One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production.

(4) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour.

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are incorporated by reference.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-2549-00152, issued on April 26, 1993 and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for gel coating station SG1 and lamination station SG2 shall be as follows:

(a) The gel coating at station SG1 shall utilize four (4) non-atomized guns or better application equipment.

(b) The fiberglass chop resin lamination at station SG2 shall utilize two (2) non-atomized guns or better application equipment.

(c) Only non-VOC containing solvents shall be used at stations SG1 and SG2.

The best available control technology (BACT) for three (3) gel coating stations EU-01 and two (2) lamination stations EU-02 shall be as follows:

To comply with the requirements of 326 IAC 8-1-6, each of these stations (three (3) gel coating stations and two (2) lamination stations) shall comply with 326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units).

D.1.4 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of this stationary van and recreational vehicle fiberglass parts manufacturing operation 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	HAP Monomer Content, (Weight %)
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (35% by weight)	38
Production, Noncorrosion 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[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.
* Categories that must use mechanical nonatomized 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.1.9 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 <u>within</u> 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 gelcoats 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 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:

$\sum Em_A \leq \sum (M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on monomer content and application method used 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 nonatomized application technology or manual application:

(1) Production noncorrosion 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.

Nonatomized 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.

Nonatomized 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) Nonatomized 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.1.5 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.1.6 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.1.7 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in condition D.1.4(a) 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.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.4(a), 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 month 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.1.6, 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.4(a) 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).

D.1.11 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

(a) Pursuant to 40 CFR 63.5905, 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) no later than August 19, 2003.

(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:

(1)

(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:

(2)

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

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) One (1) trimming station, installed in 1987, rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1;

(f) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels and one (1) cartridge type filter system for particulate matter control, with a maximum throughput of 247 pounds of fiberglass product per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimming station shall not exceed 1.01 pounds per hour when operating at a process weight rate of 0.12 tons per hour. The pounds per hour limitation was calculated using the following equation:

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) trimming stations, EU-03 shall not exceed 1.61 pounds per hour when operating at a combined process weight rate of 0.247 tons per hour.

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

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

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

D.2.2 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 these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1(a) and (b), the one (1) baghouse and the two (2) cartridge type filter systems for particulate control shall be in operation and control emissions from the three (3) trimming stations at all times that the three (3) trimming stations are in operation.

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

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(g) One (1) paint spray booth, installed in 1987, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with a high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(h) Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of HAP free adhesive per hour exhausting through general ventilation.

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

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) The volatile organic compounds (VOC) usage at the paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) shall not apply to facility SG3.

(b) Any change or modification which may increase the potential volatile organic compound emissions to 25 tons per year or more from the two (2) adhesive stations must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-1-6 (General Reduction Requirements).

D.3.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the paint spray booth SG3 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.3.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint spray booth SG3 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.4 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 the paint spray booth SG3 and its control device.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.3.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S3 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. 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.

(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.

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

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits or the VOC emission limits established in Condition D.3.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Significant Source Modification

Source Name:	**Fiber-Tron, Inc.**
Source Location:	**29877 US 33 West, Elkhart, Indiana 46516**
County:	**Elkhart**
SIC Code:	**3714**
Source Modification No.:	**SSM039-18272-00152**
Permit Reviewer:	**Seema Roy/EVP**

On March 8, 2004, the Office of Air Quality (OAQ) had a notice published in "The Truth" in Elkhart, Indiana, stating that Fiber-Tron, Inc. had applied for the addition of three (3) gel coating stations, two (2) lamination stations, two (2) trimming stations and two (2) adhesive stations to their existing stationary van and recreational vehicle fiberglass parts manufacturing operation. The notice also stated that OAQ proposed to issue a Significant Source Modification for this operation and provided information on how the public could review the proposed Significant Source Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Source Modification should be issued as proposed.

On March 30, 2004, Robert D. Waugaman of Bruce Carter Associates, LLC submitted comments on behalf of Fiber-Tron, Inc. on the proposed Significant Source Modification. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

The two (2) trimming stations identified as EU-03 in A.3 (f) and Section D.2 are each controlled by a cartridge type filter system. Please add this to the descriptions in A.3 (f) and Section D.2. Also Condition D.2.3 should be changed to reference these systems as well. The original TSD on page 8 of 28 refers to baghouses as the control in use. This should also be noted as a correction for reference.

Response 1

Condition A.3 (f) and Section D.2 have been revised as follows:

(f) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels **and one (1) cartridge type filter system for particulate matter control,** with a maximum throughput of 247 pounds of fiberglass product per hour.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) One (1) trimming station, installed in 1987, rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1;

(f) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels **and one (1) cartridge type filter system for particulate matter control,** with a maximum throughput of 247 pounds of fiberglass product per hour.

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

D.2.3 Particulate Control

In order to comply with D.2.1(a) and (b), the **one (1)** baghouse~~s~~ **and the two (2) cartridge type filter systems** for particulate control shall be in operation and control emissions from the three (3) trimming stations at all times that the three (3) trimming stations are in operation.

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

Item (b) under the 326 IAC 6-3-2 (Process Operations) discussion which is on page 8 of 28 of the original TSD shall now read as follows as documented in this addendum:

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the two (2) trimming stations shall be limited to a total of 1.61 pounds per hour based on the following equation when operating at a combined process weight rate of 496 pounds per hour (0.247 tons per hour):

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

$E = 4.10\ (0.247)^{0.67} = 1.61$ pounds of PM per hour

Each trimming station is equipped with a ~~baghouse~~ **cartridge type filter system** for particulate control. The maximum uncontrolled particulate emission rate from the trimming stations is 38.57 pounds per hour, and with ~~baghouses~~ **cartridge type filter systems**, each with 99.99% control efficiency, the maximum controlled particulate emission rate from the trimming stations is 0.0017 pounds per hour, which is less than 1.61 pounds of particulate per hour. Therefore, the trimming stations shall comply with 326 IAC 6-3-2 by using ~~a baghouses~~ **cartridge type filter systems** for particulate control at all times during operation.

Comment 2

The averaging table in Condition D.1.4 has a typo in the formula. The “sum of” character did not come through correctly in the electronic version of the draft. The TSD, page 11 of 28 and 19 of 28 also have similar problems.

Response 2

The formula in Condition D.1.4 of the permit has been revised as follows:

$\Sigma\ Em_A \leq \Sigma\ (M_R * E_a)$

Comment 3

Although Condition C.18, Emission Statement, was not changed in this modification, page 8 of 28 in the TSD references the old rule prior to the recent changes made to the rule that became effective about March 27, 2004. Please change Condition C.18 to be consistent with the revised rule, 326 IAC 2-6.

Response 3

Condition C.18 of the Part 70 Renewal No. 039-17561-00152 has been revised as follows:

~~C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]~~

~~(a) 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:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(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.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

(1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, 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).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

Comment 4

The definition of Ea in Condition D.1.4 on page 26 of 40 is in question. We believe this definition should be changed as noted below since the reason to do the averaging would be that either the source is using material with a monomer content higher than allowed or the application method being used does not meet the requirements of 326 IAC 20-25-3.

Ea = Emission factor for each material based on ~~allowable~~ monomer content and ~~allowable~~ application method **used** for each category.

Response 4

IDEM, OAQ agrees. The definition of Ea in Condition D.1.4 on page 26 of 40 of the Part 70 permit is revised as follows:

Ea = Emission factor for each material based on ~~allowable~~ monomer content and ~~allowable~~ application method **used** for each category.

Comment 5

Condition D.1.9(b) refers to Condition D.1.4(b) and (c) when it should be referring to Condition D.1.6, Operator Training for Reinforced Plastic Composites Fabrication. Please correct accordingly.

Response 5

Condition D.1.9(b) has been revised as follows:

(b) To document compliance with Condition ~~D.1.4(b) and (c)~~ **D.1.6**, 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.

Comment 6

Please change Conditions D.3.3 and D.3.4 as noted below so it is clear that these requirements only refer to the painting operation, SG3, and not to the adhesive stations which do not emit particulate matter as noted in the TSD.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~surface coating~~ **paint spray booth SG3** shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.4 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 ~~these facilities~~ **the paint spray booth SG3** and ~~their~~ **its** control device~~s~~.

Response 6

Conditions D.3.3 and D.3.4 have been revised as follows:

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

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~surface coating~~ **paint spray booth SG3** shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.4 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 ~~these facilities~~ **the paint spray booth SG3** and ~~their~~ **its** control device~~s~~.

Comment 7

Please remove the reference to Condition D.3.4 in Condition D.3.7(b) as it is not relevant since Condition D.3.6 contains the requirements referred to in Condition D.3.7(b).

Response 7

Condition D.3.7(b) has been revised as follows:

(b) To document compliance with Condition~~s~~ ~~D.3.4 and~~ D.3.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Fiber-Tron, Inc.**
Source Location:	**29877 US 33 West, Elkhart, Indiana 46516**
	29421 US 33 West, Elkhart, Indiana 46516
County:	**Elkhart**
SIC Code:	**3714**
Operation Permit No.:	**T039-17561-00152**
Operation Permit Issuance Date:	**January 26, 2004**
Significant Source Modification No.:	**039-18272-00152**
Significant Permit Modification No.:	**039-18605-00152**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Fiber-Tron, Inc. relating to the construction and operation of the following emission units and pollution control devices at this existing stationary van and recreational vehicle fiberglass parts manufacturing source:

(a) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

(b) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;

(c) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels with a maximum throughput of 247 pounds of fiberglass product per hour; and

(d) Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of non-HAP adhesive per hour exhausting through general ventilation.

Insignificant Activities:

(a) Six (6) natural gas radial heaters, each with a maximum heat input rate of 0.175 mm Btu per hour and two (2) natural gas radial heaters, each with a maximum heat input rate of 0.2 mm Btu per hour;

(b) One (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour; and

(c) One mold shop using one (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour as well as hand lay-up. The VOC emissions from this process will remain at a rate less than 15 pounds per day.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source was issued a Part 70 Renewal Permit T039-17561-00152 on January 26, 2004.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and the Significant Permit Modification, 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 application for the purposes of this review was received on December 1, 2003. Additional information was received on January 5, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 6).

Potential To Emit Before Controls (Modification)

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 potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	188.4
PM-10	188.4
SO_2	0.00
VOC	158.25
CO	0.5
NO_x	0.6

HAP's	Potential To Emit (tons/year)
Styrene	Greater than 10
MMA	Greater than 10
MEK	Less than 10
Toluene	Less than 10
Xylene	Less than 10
TOTAL	Greater than 25

Justification for Modification

The Part 70 operating permit is being modified through both a Part 70 Significant Source Modification and Significant Permit Modification. These modifications are being performed based on the following justification:

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) and PM-10 are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(4) for this significant source modification.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single hazardous air pollutant (HAP), as defined under Section 112(b) of the Clean Air Act (CAA), 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 of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(6) for this significant source modification.

(c) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as Significant Permit Modification No. 039-18605-00152 in accordance with 326 IAC 2-7-12(d). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	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 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 the remaining 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 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.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	6.6
PM-10	6.6
SO_2	0.00
VOC	<84.8
CO	0.3
NOx	0.4
Single HAP	>10
Total HAPs	>25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document to the Part 70 Renewal Permit No. T039-17561-00152, issued on January 26, 2004.

Potential to Emit After Issuance for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (PTE) of Modification After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
PTE of Modification (New Gel Coating Stations)	2.44	2.44	0.00	69.02	0.00	0.00	>10 (single) >25 (total)
PTE of Modification (New Lamination Stations)	7.15	7.15	0.00	71.46	0.00	0.00	>10 (single) >25 (total)
PTE of Modification (New Trimming Stations)	7.04*	7.04*	0.00	0.00	0.00	0.00	0.00
PTE of Modification (New Adhesive Stations)	0.00	0.00	0.00	16.38	0.00	0.00	0.00
PTE of Modification (New Natural Gas Combustion)	0.01	0.05	0.00	0.03	0.53	0.64	Negligible
PTE of Modification (New Mold Shop)	2.1	2.1	0.00	1.39	0.00	0.00	Negligible
Total PTE of Modification	18.74	18.78	0.00	158.28	0.53	0.64	>10 (single) >25 (total)
PSD Threshold Level	250	250	250	250	250	250	N/A

* Based 326 IAC 6-3-2 allowable emissions.

	Potential to Emit (PTE) of Source After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Total PTE of Modification	18.74	18.78	0.00	158.28	0.53	0.64	>10 (single) >25 (total)
PTE (Existing Gel Coating Stations)	0.0	0.0	0.0	20.2	0.0	0.0	15.3
PTE (Existing Lamination Stations)	0.0	0.0	0.0	39.6	0.0	0.0	39.6
PTE (Existing Trimming Stations)	2.0	2.0	0.0	0.0	0.0	0.0	0.0
PTE (Existing Paint Spray Booth)	4.6	4.6	0.0	<25	0.0	0.0	4.7
PTE (Existing Natural Gas Combustion)	0.00	0.00	0.00	0.00	0.3	0.4	Negligible
Total PTE for Source after Issuance	25.34	25.38	0.00	<243.08	0.83	1.04	>10 (single) >25 (total)
PSD Threshold	250	250	250	250	250	250	N/A

(a) This modification to an existing minor stationary source is not major because the emission increase of the modification is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing source will not change the PSD minor status after the modification because the emissions from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) The open molding (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. The provisions of this Subpart apply to each reinforced plastic composites production facility that is located at a major source of HAP (as defined in 40 CFR 63.2, Subpart A) emissions. The open molding area for the source uses styrene-containing resins and gel coats in its manufacturing process and is a major source of HAPs. Therefore, the requirements of this rule apply to this source. 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) no later than August 19, 2003. The source submitted the Initial Notification on August 11, 2003.

(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.

Prior to the final promulgation of Subpart WWWW on April 21, 2003, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) were applicable to this source. The Permittee submitted the requisite Part 1 MACT Application on April 29, 2002, before the May 15, 2002 reporting deadline. Notwithstanding the Part 1 application, the Permittee is required to comply with an applicable MACT standard that is promulgated prior to the Section 112(j) MACT deadline for a Part 2 MACT application [40 CFR 63.52(a)]. Since such deadline has not occurred, the Section 112(j) requirements no longer apply to this source and are instead replaced by the requirements of 40 CFR 63, Subpart WWWW.

(c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

The gel coating stations and the lamination stations for the modification are not subject to the requirements of 40 CFR 64, because each station is subject to the MACT standards of 40 CFR 63, and pursuant to 40 CFR 64.2(b)(1)(i), these units are exempt from the requirements of 40 CFR 64.

No other unit for the modification 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. Therefore, this modification is not subject to the requirements of 40 CFR 64.

State Rule Applicability - Entire Source

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

This modification to an existing minor stationary source is not major because the source, which is not one of the 28 listed source categories, does not have the potential to emit of 250 tons per year or more of any criteria pollutant after enforceable controls and limitations. The source will continue to be a minor stationary source after the modification and no attainment regulated pollutant shall be emitted at a rate of 250 tons per year or more. Therefore, the PSD requirements do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAP, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the source is subject to 40 CFR 63, Subpart WWWW.

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 volatile organic compounds and it is located in Elkhart County. Pursuant to this rule, the owner/operator of the source 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%) 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 - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) The two (2) adhesive stations are not subject to this rule because there are no PM emissions from these facilities.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the two (2) trimming stations shall be limited to a total of 1.61 pounds per hour based on the following equation when operating at a combined process weight rate of 496 pounds per hour (0.247 tons per hour):

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

$E = 4.10\ (0.247)^{0.67} = 1.61$ pounds of PM per hour

Each trimming station is equipped with a baghouse for particulate control. The maximum uncontrolled particulate emission rate from the trimming stations is 38.57 pounds per hour, and with baghouses, each with 99.99% control efficiency, the maximum controlled particulate emission rate from the trimming stations is 0.0017 pounds per hour, which is less than 1.61 pounds of particulate per hour. Therefore, the trimming stations shall comply with 326 IAC 6-3-2 by using a baghouses for particulate control at all times during operation.

Note: The gel coating stations and the lamination stations are not subject to this rule because the non-atomized guns used at these stations are flow-coaters, which have negligible PM emissions. Therefore, pursuant to 326 IAC 6-3-1(b)(7), they are not subject to 326 IAC 6-3-2.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

Although the potential VOC emissions from each of the three (3) gel coating stations is slightly less than 25 tons per year, making the requirements of this rule not applicable, the source has voluntarily agreed to comply with 326 IAC 8-1-6 (General Reduction Requirements) for future expansions. The two (2) lamination stations are subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because each of them has a potential to emit VOC in excess of 25 tons per year.

To comply with the requirements of 326 IAC 8-1-6, each of these stations (three (3) gel coating stations and two (2) lamination stations) shall comply with 326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units).

This is accepted by OAQ as a Best Available Control Technology (BACT) for the three (3) gel coating stations and the two (2) lamination stations. Therefore, the three (3) gel coating stations and the two (2) lamination stations shall comply with this rule.

The two (2) adhesive stations, identified as EU-04, are not subject to this rule because the potential VOC emissions from these stations are less than 25 tons per year.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. All the facilities for this modification, located in Elkhart County are to be constructed after January 1, 1980. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Elkhart County. Therefore, this rule is not applicable to this modification.

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

This rule applies to owners or operators of sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, and that meet all of the following criteria:

(a) Manufacture reinforced plastics composites parts, products, or watercraft;

(b) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process; and

(c) Have actual emissions of styrene equal to or greater than three (3) tons per year.

This modification is subject to the requirements of 326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units) because:

(a) It has a potential to emit 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of any combination of HAPs and it manufactures reinforced plastics composites parts;

(b) It has an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process; and

(c) It has actual emissions of styrene equal to or greater than three (3) tons per year.

Pursuant to 326 IAC 20-25-3, the owner or operator of this stationary van and recreational vehicle fiberglass parts manufacturing operation 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	HAP Monomer Content, (Weight %)
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Production, Noncorrosion 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[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.
* Categories that must use mechanical nonatomized 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 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 <u>within</u> 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 gelcoats 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 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

$$\sum Em_A \leq \sum (M_R * E_a)$$

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).

Em_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 nonatomized application technology or manual application:

(1) Production noncorrosion 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.

Nonatomized 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.

Nonatomized 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) Nonatomized 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 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.

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.

The source is in compliance with 326 IAC 20-25-1.

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

This modification does not have any specific compliance monitoring requirements.

There are no PM emissions from the two (2) adhesive stations. Therefore, they do not have any compliance monitoring requirements.

There are no specific compliance monitoring requirements applicable to the two (2) trimming stations, because each of them has a baghouse as a control device and the combined allowable emissions for the controlled pollutant are less than 10 lb/hr.

Changes to the Part 70 Permit Due to This Modification:

The changes listed below have been made to Part 70 Permit Renewal T039-17561-00152. This includes revising Sections A.3, A.4 and the equipment description box at Sections D.1, D.2 and D.3, and conditions in Sections D.1, D.2 and D.3 as necessary, to include the three (3) new gel coating stations, two (2) new lamination stations, two (2) new adhesive stations and two (2) new trimming stations. All conditions are renumbered as necessary, without replication herein. The changes to the permit are as follows:

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

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

(a) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only;

(b) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

~~(b)~~ **(c)** One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production;

(d) **Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;**

~~(c)~~ **(e)** One (1) trimming station, installed in 1987, rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1; ~~and~~

(f) **Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels with a maximum throughput** of **247 pounds of fiberglass product per hour.**

~~(d)~~ **(g)** One (1) paint spray booth, installed in 1987, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with a high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3~~.~~ **; and**

(h) **Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of HAP free adhesive per hour exhausting through general ventilation.**

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

This stationary source also includes the following insignificant activities 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) British thermal units (Btu) per hour:

(1) Two (2) 150,000 Btu/hr tube heaters; ~~and~~

(2) One (1) 600,000 Btu/hr Thermocycler heater~~.~~ **; and**

(3) **Six (6) natural gas radial heaters, each with a maximum heat input rate of 0.175 mm Btu per hour and two (2) natural gas radial heaters, each with a maximum heat input rate of 0.2 mm Btu per hour;**

(b) Volatile organic compound (VOC) or hazardous air pollutant (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(d) Solvent recycling systems with batch capacity less than or equal to 100 gallons;

(e) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius);

(f) Mold construction area in plant 1, utilizing one (1) portable air assisted airless gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable air assisted airless fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour.

(g) Mold construction area in plant 2, utilizing a hand lay-up application, emitting less than three (3) pounds per hour or fifteen (15) pounds per day of volatile organic compounds~~;~~**, one (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour.**

(h) Paint mixing and storage room;

(i) Miscellaneous trim/sanding equipment with no dust collection system; and

(j) Four (4) hand sanders and one (1) table saw in plant 2~~.~~ **; and**

(k) One mold shop using one (1) portable non-atomized gel coat spray gun rated at 0.5 pounds of gel coat per hour and one (1) portable non-atomized fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour as well as hand lay-up. The VOC emissions from this process will remain at a rate less than 15 pounds per day.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only;

(b) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change;

~~(b)~~ **(c)** One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production;

(d) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour;

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

Emissions Limitation and Standards

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart 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.

D.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

(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.

(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:

(1) One (1) gel coating station, identified as SG1, installed in 1987, using a maximum of 30 pounds of gel coat per hour, equipped with one (1) non-atomized gun, used as the primary gun and three (3) non- atomized guns used for color changes only.

(2) Three (3) gel coating stations, identified as EU-01, each with a maximum throughput of 30 pounds of gel resin per hour, exhausting to stacks S-4, S-5 and S-6. Each gel coating station will have four (4) non-atomized guns, three (3) will be used for color change.

~~(2)~~ **(3)** One (1) lamination station, identified as SG2, installed in 1987, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with two (2) non-atomized guns used for production.

(4) Two (2) lamination stations, identified as EU-02, containing two (2) non-atomized guns used for production, exhausting to stacks S-7.1, S-7.2, S-8.1 and S-8.2. Each lamination station has a maximum throughput of 234.5 pounds of fiberglass chop resin per hour.

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are incorporated by reference.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-2549-00152, issued on April 26, 1993 and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for gel coating station SG1 and lamination station SG2 shall be as follows:

(a) The gel coating at station SG1 shall utilize four (4) non-atomized guns or better application equipment.

(b) The fiberglass chop resin lamination at station SG2 shall utilize two (2) non-atomized guns or better application equipment.

(c) Only non-VOC containing solvents shall be used at stations SG1 and SG2.

The best available control technology (BACT) for three (3) gel coating stations EU-01 and two (2) lamination stations EU-02 shall be as follows:

To comply with the requirements of 326 IAC 8-1-6, each of these stations (three (3) gel coating stations and two (2) lamination stations) shall comply with 326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units).

D.1.4 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of this stationary van and recreational vehicle fiberglass parts manufacturing operation 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	HAP Monomer Content, (Weight %)
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Production, Noncorrosion 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[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.
* Categories that must use mechanical nonatomized 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.1.7 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 <u>within</u> 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 gelcoats 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 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 nonatomized application technology or manual application:

(1) Production noncorrosion 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.

Nonatomized 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.

Nonatomized 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) Nonatomized 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.1.5 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.1.6 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.1.7 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~~ **these facilities** and ~~its~~ **their** control device**s**.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content limitations in condition D.1.4(a) 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.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.4(a), 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 month 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.1.4(b) and (c), 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.4(a) 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).

D.1.11 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

(a) Pursuant to 40 CFR 63.5905, 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) no later than August 19, 2003.

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

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

~~(c)~~ **(e)** One (1) trimming station, installed in 1987, rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1; ~~and~~

(f) Two (2) trimming stations, identified as EU-03, each equipped with two (2) hand-held trimming wheels with a maximum throughput of 247 pounds of fiberglass product per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimming station shall not exceed 1.01 pounds per hour when operating at a process weight rate of 0.12 tons per hour. The pounds per hour limitation was calculated using the following equation:

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) trimming stations, EU-03 shall not exceed 1.61 pounds per hour when operating at a combined process weight rate of 0.247 tons per hour.

The pounds per hour limitation**s** ~~was~~ **were** calculated using the following equation:

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

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

D.2.2 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~~ **these facilities** and ~~its~~ **their** control device**s**.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1(a) and (b), the baghouse**s** for particulate control shall be in operation and control emissions from the **three (3)** trimming station**s** at all times that the **three (3)** trimming station**s** ~~is~~ **are** in operation.

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

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

~~(d)~~ **(g)** One (1) paint spray booth, installed in 1987, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with a high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3~~.~~ **; and**

(h) Two (2) adhesive stations, identified as EU-04, each with two (2) high volume low pressure (HVLP) spray application guns with a maximum throughput of 5.42 pounds of HAP free adhesive per hour exhausting through general ventilation.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The volatile organic compounds (VOC) usage at the paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) shall not apply to facility SG3.

(b) Any change or modification which may increase the potential volatile organic compound emissions to 25 tons per year or more from the two (2) adhesive stations must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-1-6 (General Reduction Requirements).

D.3.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the paint spray booth SG3 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.3.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.3.4 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~~ **these facilities** and ~~its~~ **their** control device**s**.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition~~s~~ D.3.1**(a)** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.3.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S3 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. 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.

(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.

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

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1**(a)**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits or the VOC emission limits established in Condition D.3.1**(a)**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.3.4 and D.3.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1**(a)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

Company Name: Fiber-Tron, Inc.
Address City IN Zip: 29877 US 33 West, Elkhart, IN 46516
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: 039-17561-00152
Significant Source Modification No.: 039-18272-00152
Significant Permit Modification No.: 039-18605-00152
Reviewer: Seema Roy

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat.(gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/year)
Gel Coating Stations	Yellow Gel Coat (Styrene)	10.02	28.10%	8.982	1.00	152.00	164.16	29.96	99.00%	2.44
	(MMA)	10.02	10.00%	8.982	1.00	150.00	162.00	29.56		
	Trav Supreme (Styrene)	10	30.00%	9.004	0.00	169.00	0.00	0.00	99.00%	0.00
	(MMA)	10	5.00%	9.004	0.00	75.00	0.00	0.00		
	Deep Blue (Styrene)	9.95	40.35%	9.049	1.00	259.00	279.84	51.07	99.00%	2.35
	(MMA)	9.95	0.00%	9.049	1.00	0.00	0.00	0.00		
	Dark Red (Styrene)	10.02	40.43%	9.892	0.00	259.00	0.00	0.00	99.00%	0.00
	(MMA)	10.02	0.00%	9.892	0.00	0.00	0.00	0.00		
	Victory Red (Styrene)	9	32.00%	10.004	0.00	187.00	0.00	0.00	99.00%	0.00
	(MMA)	9	0.00%	10.004	0.00	0.00	0.00	0.00		
	Miller Silver (Styrene)	10.02	37.14%	8.982	0.00	232.00	0.00	0.00	99.00%	0.00
	(MMA)	10.02	5.00%	8.982	0.00	75.00	0.00	0.00		
	White PW6 (Styrene)	10	25.00%	9.004	0.00	124.00	0.00	0.00	99.00%	0.00
	(MMA)	10	4.00%	9.004	0.00	60.00	0.00	0.00		
	Safety Yellow (Styrene)	9.83	31.00%	9.156	0.00	178.00	0.00	0.00	99.00%	0.00
	(MMA)	9.83	4.00%	9.156	0.00	60.00	0.00	0.00		
	Hovercraft Red (Styrene)	9.66	29.00%	9.314	0.00	160.00	0.00	0.00	99.00%	0.00
	(MMA)	9.66	4.00%	9.314	0.00	60.00	0.00	0.00		
	Sunlight WH (Styrene)	8.33	32.00%	10.804	0.00	187.00	0.00	0.00	99.00%	0.00
	(MMA)	8.33	4.50%	10.804	0.00	67.50	0.00	0.00		
	Deep Lime G (Styrene)	10	50.00%	9.004	1.00	350.00	378.17	69.02	99.00%	1.97
	(MMA)	10	0.00%	9.004	1.00	0.00	0.00	0.00		
	Teal (Styrene)	9.91	50.00%	9.079	0.00	350.00	0.00	0.00	99.00%	0.00
	(MMA)	9.91	0.00%	9.079	0.00	0.00	0.00	0.00		
	YZ Ford White (Styrene)	11.11	29.93%	8.099	0.00	169.00	0.00	0.00	99.00%	0.00
	(MMA)	11.11	4.97%	8.099	0.00	75.00	0.00	0.00		
	Purple (Styrene)	9.83	50.00%	9.156	0.00	350.00	0.00	0.00	99.00%	0.00
	(MMA)	9.83	0.00%	9.156	0.00	0.00	0.00	0.00		
	Off White (Styrene)	10.83	40.00%	8.311	0.00	259.00	0.00	0.00	99.00%	0.00
	(MMA)	10.83	4.00%	8.311	0.00	60.00	0.00	0.00		
	Black Neo (Styrene)	9.58	40.00%	9.395	0.00	259.00	0.00	0.00	99.00%	0.00
	(MMA)	9.58	4.00%	9.395	0.00	60.00	0.00	0.00		
	Fourseal Primer (Styrene)	11.04	25.33%	8.152	0.00	127.00	0.00	0.00	99.00%	0.00
	(MMA)	11.04	2.00%	8.152	0.00	30.00	0.00	0.00		
	Magnum Spray (Styrene)	9.58	32.00%	9.395	0.00	187.00	0.00	0.00	99.00%	0.00
	(MMA)	9.58	5.00%	9.395	0.00	75.00	0.00	0.00		
Lamination Stations										
	Polyster Resin (Styrene)	9.16	34.00%	51.184	0.00	74.00	0.00	0.00	99.00%	0.00
	Polylite (Styrene)	9.25	32.50%	50.723	1.00	69.55	391.58	71.46	99.00%	7.15
	Aroplo (Styrene)	8.33	32.70%	56.303	0.00	69.98	0.00	0.00	99.00%	0.00
Mold Shop										
	Hydrex (Styrene)	9.33	47.00%	0.268	1.00	163.00	4.89	0.89	25.00%	1.15
	Tangerine T (Styrene)	9.53	38.97%	0.052	1.00	259.00	1.54	0.28	25.00%	0.94
	(MMA)	9.53	3.00%	0.052	1.00	45.00	0.27	0.05		
	Dynatron (Styrene)	10	40.00%	0.047	1.00	123.00	0.69	0.13	99.00%	0.01
						Total VOC/HAP and PM from Resin and Gel Use		**141.83**		**11.69**

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet fglassap42.wb3.

METHODOLOGY

Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) were used to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 24 hrs/day * 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)

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

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Fiber-Tron, Inc.
Address City IN Zip: 29877 US 33 West, Elkhart, IN 46516
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: 039-17561-00152
Significant Source Modification No.: 039-18272-00152
Significant Permit Modification No.: 039-18605-00152
Reviewer: Seema Roy

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Adhesive Station																
Soft Seam Adhesive	6.7	34.51%	0.0%	34.5%	0.0%	65.49%	1.62700	1.000	2.30	2.30	3.74	89.75	16.38	0.00	3.51	100%
Mold Shop																
Chemlease # 15 Sealer	7.3	99.00%	0.0%	99.0%	0.0%	1.00%	0.00059	1.000	7.18	7.18	0.00	0.10	0.02	0.00	717.75	25%
Chemlease Mold C.	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.00059	1.000	6.91	6.91	0.00	0.10	0.02	0.00	#DIV/0!	25%
												89.95	**16.42**	**0.00**		

Uncontrolled Potential Emissions **Add worst case coating to all solvents**
Limited Potential emissions

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)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
The coating/reducer "as-applied" mixture ratio is 40% coating to 60% reducer. Only one coating is applied at a time.
** Limted Potential Emissions to avoid 326 IAC 8-1-6.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Fiber-Tron, Inc.
Address City IN Zip: 29877 US 33 West, Elkhart, IN 46516
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: 039-17561-00152
Significant Source Modification No.: 039-18272-00152
Significant Permit Modification No.: 039-18605-00152
Reviewer: Seema Roy

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Adhesive Station												
Soft Seam Adhesive	6.7	1.62700	1.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Mold Shop												
Chemlease # 15 Sealer	7.3	0.00059	1.000	0.00%	0.00%	10.00%	45.00%	0.00	0.00	0.00	0.01	0.01
Chemlease Mold C.	6.9	0.00059	1.000	55.00%	55.00%	0.00%	0.00%	0.01	0.01	0.00	0.00	0.02
Uncontrolled Potential Emissions			**Add worst case coating to all solvents**					**0.01**	**0.01**	**0.00**	**0.01**	**0.03**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Trimming Particulate Emissions

Company Name: Fiber-Tron, Inc.
Address City IN Zip: 29877 US 33 West, Elkhart, IN 46516
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: 039-17561-00152
Significant Source Modification No.: 039-18272-00152
Significant Permit Modification No.: 039-18605-00152
Reviewer: Seema Roy

Uncontrolled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
EU-02	2	0.00001	4500.0	99.99%	16.89

Total Emissions Based on Rated Capacity at 8,760 Hours/Year **16.89**

Controlled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
E	2	0.00001	4500.0	99.99%	0.0017

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls **0.00**

Methodology:

Potential (uncontrolled):
Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):
Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)*Air flow rate in actual cubic feet per minute*60 minutes per hour/7000 grains per pound/2000 pounds*8760 hours per year.

Appendix A: Emissions Calculations
Natural Gas Combustion
MM BTU/HR <100
Heaters

Company Name: **Fiber-Tron, Inc.**
Address City IN Zip: **29877 US 33 West, Elkhart, IN 46516**
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: **039-17561-00152**
Significant Source Modification No.: **039-18272-00152**
Significant Permit Modification No.: **039-18605-00152**
Reviewer: **Seema Roy**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.5	12.7

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6 0.9	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.05	0.00	0.64	0.03	0.53

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: The source has one (1) make up air unit and ten (10) space heaters. Caulations have been done assuming the worst case of 10 MMBtu/hr for each unit.
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Heaters
HAPs Emissions

Company Name: **Fiber-Tron, Inc.**
Address City IN Zip: **29877 US 33 West, Elkhart, IN 46516**
29421 US 33 West, Elkhart, IN 46516
Operation Permit No.: **039-17561-00152**
Significant Source Modification No.: **039-18272-00152**
Significant Permit Modification No.: **039-18605-00152**
Reviewer: **Seema Roy**

HAPs - Organics

	Benzene	e	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.334E-05	7.621E-06	4.763E-04	1.143E-02	2.159E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.176E-06	6.986E-06	8.891E-06	2.413E-06	1.334E-05

Methodology is the same as page 2.

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