INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
Governor

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Commissioner

100 North Senate Avenue
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June 25, 2004

Mr. Jason Sauder
Paragon Plastics, L.L.C.
P.O. Box 119
Garrett, Indiana 16738

Re: **033-18477**
First Significant Permit Modification to
Part 70 No.: T 033-7084-00046

Dear Mr. Sauder:

Paragon Plastics, L.L.C. was issued a permit on December 30, 1999 for the operation of a closed mold fiberglass manufacturing source. A letter requesting changes to this permit was received on October 24, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of constructing and operating abrasive blasting, paintbooth, gelcoat and resin, and flat panel (pressure) molding operations.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Stephanie A. Ryan, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SAR/MES
cc: File - DeKalb County
U.S. EPA, Region V
DeKalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michelle Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Paragon Plastics, L.L.C.
301 North Taylor Road
Garrett, Indiana 46738

(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.

Operation Permit No.:T033-7084-00046	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 30, 1999 Expiration Date: December 30, 2004

First Administrative Amendment, AAT 033-11811-00046, issued March 22, 2000
First Reopening, 033-13181-00046, issued December 26, 2001
Second Administrative Amendment, AAT 033-16160-00046, issued October 4, 2002

First Significant Permit Modification 033-18477-00046	Pages Affected: Table of Contents, 4, 5, and 17 Sections Added: D.2 through D.5
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 25, 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates:

Responsible Official:	General Manager
Source Address:	301 North Taylor Road, Garrett, Indiana 46738
Mailing Address:	P.O. Box 119, Garrett, Indiana 46738
Phone Number:	(260) 357-4161
SIC Code:	3089
County Location:	Dekalb
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

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

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

(a) Nine closed molding presses, identified as EU-01, with a maximum capacity of 180 Parts per hour, exhausting to GV-1.

(b) One (1) abrasive blasting operation, identified as EU-02, equipped with dry filters for particulate control, to be constructed in 2004, capacity: 0.5 parts per hour.

(c) One (1) paintbooth operation, identified as EU-03, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stacks 03A and 03B, to be constructed in 2004, capacity: 5.495 parts per hour.

(d) One (1) paintbooth operation, identified as EU-05, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack 06, to be constructed in 2004, capacity: 5.495 parts per hour.

(e) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(f) One (1) flat panel (pressure) molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts per hour.

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

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

(a) One (1) trim cutting booth, identified as EU-04, to be constructed in 2004, capacity: 5.495 parts per hour. [326 IAC 6-3-2]

(b) Infrared cure equipment.

(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(e) Forced and induced draft cooling tower system not regulated under a NESHAP.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(g) Paved and unpaved roads and parking lots with public access.

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

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

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

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this significant source modification to Part 70 Operating Permit 033-7084-00046 if the:

(a) Construction of the one (1) paintbooth operation, identified as EU-03, has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the one (1) paintbooth operation, identified as EU-03, work is suspended for a continuous period of one (1) year or more.

(b) Construction of the one (1) paintbooth operation, identified as EU-05, has not begun within twelve (12) months after the operation of the one (1) paintbooth operation, identified as EU-03, or if during the construction of the one (1) paintbooth operation, identified as EU-05, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) abrasive blasting operation, identified as EU-02, equipped with dry filters for particulate control, to be constructed in 2004, capacity: 0.5 parts 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]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) abrasive blasting operation shall not exceed 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour.

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the dry filters for particulate control shall be in operation and control emissions from the one (1) abrasive blasting operation at all times that the abrasive blasting is in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) One (1) paintbooth operation, identified as EU-03, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stacks 03A and 03B, to be constructed in 2004, capacity: 5.495 parts per hour.

(d) One (1) paintbooth operation, identified as EU-05, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack 06, to be constructed in 2004, capacity: 5.495 parts 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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to the HVLP spray applicators of the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

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

Pursuant to 40 CFR 52, Subpart P, the PM from the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, 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 these facilities and any control devices.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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 Stacks 3, 4 and 6 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 deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground, weather permitting. During times of inclement weather, (i.e. snow, ice, torrential rain, excessive winds, etc.), the inspection shall be performed as soon as weather permits. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [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, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

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

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

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

(c) To document compliance with Condition D.3.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.3.8 Reporting Requirements

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

SECTION D.4 FACILITY OPERATION CONDITION

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

(e) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(f) One (1) flat panel (pressure) molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts 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.4.1 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the one (1) gelcoat and resin 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 Except Watercraft	HAP Monomer Content, Weight Percent
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).

Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

* 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.4.8(a) is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging <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 gelcoat
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.4.2 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.4.3 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.4.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.4.5 Emissions Standards for Open Molding Resin and Gel Coat Operations [40 CFR 63, Subpart VVVV]]

Pursuant to 40 CFR 63.5698, the total organic HAP emissions from the boat deck and hull manufacturing operation that is part of the open molding operations shall be limited by the following equation:

$$\text{HAP Limit} = [46(M_R)+159(M_{PG})+291(M_{CG})+54(M_{TR})+214(M_{TG})]$$

Where: M_R = mass of production resin used in the past twelve (12) months, megagrams;

M_{PG} = mass of pigmented gel coat used in the past twelve (12) months, megagrams;

M_{CG} = mass of clear gel coat used in the past twelve (12) months, megagrams;

M_{TR} = mass of tooling resin used in the past twelve (12) months, megagrams;

and

M_{TG} = mass of tooling gel coat used in the past twelve (12) months, megagrams.

This limitation is based on a twelve (12) month rolling average period beginning on August 23, 2004.

D.4.6 Standards for Resin and Gel Coat Mixing Operations [40 CFR 63.5731]

Pursuant to 40 CFR 63.5731, the following work practice standards shall be implemented:

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters must have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) In order to show compliance with Condition D.4.6(a), the Permittee shall make monthly visual inspections to ensure that all containers have covers with no visible gaps between the cover and container, or between the cover and equipment passing through the cover.

(c) The Permittee shall maintain records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

D.4.7 Standards for Resin and Gel Coat Application Equipment Cleaning Operations [40 CFR 63.5734]

Pursuant to 40 CFR 63.5734, the following work practice standards shall be implemented:

(a) For routine flushing of resin and gel coat application equipment, the Permittee must use a cleaning solvent that contains no more than five percent (5%) organic HAP by weight. No organic HAP content limit applies for removing cured resin or gel coat from the application equipment.

(b) Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container.

(c) On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

D.4.8 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

(a) The miscellaneous resin/gelcoating operation that is part of the reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

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

One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.

D.4.9 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.4.10 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 any control devices.

Compliance Determination Requirements

D.4.11 Hazardous Air Pollutants (HAPs) [40 CFR 63.5704]

Compliance with the HAP emission limitations in Condition D.4.5 using emissions averaging shall be determined by the following:

(a) Pursuant to 40 CFR 63.5758, the Permittee must determine the organic HAP content for each material used in the open molding and resin and gel coat operation using one (1) of the following methods:

(1) Method 311 (appendix A to 40 CFR 63)

(2) Method 24 (appendix A to 40 CFR 60)

(3) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)

(b) Compliance using emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month beginning on August 23, 2004.

(1) At the end of the twelfth month following August 23, 2004 and at the end of every subsequent month, compliance with Condition D.4.5 shall be demonstrated using the following equation:

$$\text{HAP emissions} = [(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$$

Where:

PV_R = Weighted-average MACT model point value for production resin used in the past twelve (12) months, kilograms per megagram;

M_R = Mass of production resin used in the past twelve (12) months, megagrams;

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past twelve (12) months, kilograms per megagram;

M_{PG} = Mass of pigmented gel coat used in the past twelve (12) months, megagrams;

PV_{CG} = Weighted-average MACT model point value for clear coat used in the past twelve (12) months, kilograms per megagram;

M_{CG} = Mass of clear gel coat used in the past twelve (12) months, megagrams;

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past twelve (12) months, kilograms per megagram;

M_{TR} = Mass of tooling resin used in the past twelve (12) months, megagrams;

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past twelve (12) months, kilograms per megagram; and

M_{TG} = Mass of tooling gel coat used in the past twelve (12) months, megagrams.

(2) At the end of every month, the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average shall be calculated as follows:

$$PV_{OP} = 3(M_i\ PV_i) / 3(M_i)$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation included in the average, kilograms of HAP per megagram of material applied;

M_i = mass of individual resin or gelcoat used within an operation in the past twelve (12) months, megagrams; and

PV_i = the MACT model point value for individual resin or gel coat used within an operation in the past twelve (12) months, kilograms of HAP per megagram of material applied.

(3) The MACT model point value (PV_i) for each resin and gel coat used in each operation in the past twelve (12) months shall be calculated using the following equation:

$$PV_i = 0.014 \times (\text{Resin HAP } \%)^{2.275}$$

(c) The following records must be kept for each gel coat and resin:

(1) Hazardous air pollutant content.

(2) Amount of material used per month.

(3) Calculations performed to demonstrate compliance based on MACT model point values.

(d) The Permittee must prepare and submit the implementation plan to the Administrator as specified in 40 CFR 63.5707.

(e) The Permittee must submit semiannual compliance reports to the Administrator as specified in 40 CFR 63.5764.

Record Keeping and Reporting Requirements

D.4.12 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, 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 months 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.4.3, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Condition D.4.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP emission limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) A copy of all notifications and reports referenced in Table 7 of 40 CFR 63, Subpart VVVV.

(2) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight percent. For open molding production resin and tooling resin, the Permittee must record the amount of each applied by atomized and nonatomized methods.

(d) To document compliance with Condition D.4.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.4.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.

(c) The significant permit modification application shall be submitted to:

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

D.4.14 Reporting Requirements [40 CFR 63.5764]

(a) The Permittee must submit compliance reports by the following dates:

(1) The first compliance report must cover the period of August 23, 2005 through December 31, 2005.

(2) The first compliance report must be postmarked or delivered no later than March 1, 2006.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from July 1 through December 31 of each year.

(4) Each subsequent compliance report must be postmarked or delivered no later than March 1 of the following year.

(b) The compliance report must include the following information:

(1) Source name and address.

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

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

(4) A description of any changes in the manufacturing process since the last compliance period.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the source is complying. The statement or table must also show the actual weighted-average MACT model point value, if applicable, for each operation during each of the rolling twelve (12) month averaging periods that end during the reporting period.

(6) The Permittee must provide a statement verifying If the source was in compliance with emission limits and work practice standards during the reporting period.

(7) If the source deviated from an emission limit or work practice standard during the reporting period, the Permittee must include the following information:

(A) A description of the operation involved in the deviation.

(B) The quantity, organic HAP content, and application method of the materials involved in the deviation.

(C) A description of any corrective action taken to minimize the deviation.

(D) A statement of whether or not the facility was in compliance for the twelve (12) month averaging period that ended at the end of the reporting period.

D.4.15 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.4.1(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).

SECTION D.5 FACILITY OPERATION CONDITION

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

(a) One (1) trim cutting booth, identified as EU-04, to be constructed in 2004, capacity: 5.495 parts per hour. [326 IAC 6-3-2]

(b) Infrared cure equipment.

(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(e) Forced and induced draft cooling tower system not regulated under a NESHAP.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(g) Paved and unpaved roads and parking lots with public access.

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

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

There are no applicable rules for these insignificant activities.

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

Part 70 Quarterly Report

Source Name: Paragon Plastics, L.L.C.
Source Address: 301 North Taylor Road, Garrett, Indiana 46738
Mailing Address: P.O. Box 119, Garrett, Indiana 46738
Part 70 Permit No.: T 033-7084-00046
Facility: Paintbooth Operations
Parameter: VOC
Limit: total of less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Paragon Plastics, L.L.C.
Source Address: 301 North Taylor Road, Garrett, Indiana 46738
Mailing Address: P.O. Box 119, Garrett, Indiana 46738
Part 70 Permit No.: 033-7084-00046

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

issued June 25, 2004

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	**Paragon Plastics, L.L.C.**
Source Location:	**301 North Taylor Road, Garrett, Indiana 46738**
County:	**DeKalb**
SIC Code:	**3089**
Operation Permit No.:	**T 033-7084-00046**
Significant Source Modification No.:	**033-18112-00046**
Significant Permit Modification No.:	**033-18477-00046**
Permit Reviewer:	**Stephanie A. Ryan**

On March 29, 2004, the Office of Air Quality (OAQ) had a notice published in the Evening Star, Auburn, Indiana, stating that Paragon Plastics, L.L.C. had applied for a Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit to construct and operate an abrasive blasting booth with dry filters, a flat panel molding facility, a gelcoat operation and a paint booth with dry filters. The notice also stated that OAQ proposed to issue Significant Source and Permit Modifications and provided information on how the public could review the proposed Significant Source Modification, Significant Permit 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 the Significant Source and Permit Modifications to a Part 70 Operating Permit should be issued as proposed.

On April 29, 2004, Mike Cira of Bruce Carter Associates on behalf of Paragon Plastics, L.L.C., submitted comments on the proposed Significant Source Modification to a Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

Condition D.3.1 Volatile Organic Compounds (VOC) (326 IAC 8-1-6): The equipment in use in the paint booth system consists of HVLP spray applicators. The flow coaters are used only on the resin and gel coating applications and are covered in Section D.4 Reinforced Plastics Fabrication.

Compliance with the twelve (12) consecutive month period should be demonstrated within 30 days of the end of each month to allow Paragon Plastics personnel ample time to perform all necessary calculations. The following is the section with the suggested changes made.

"The VOC content delivered to the HVLP spray applicators, the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated within 30 days of the end of each month. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply."

Response 1:

The one (1) paintbooth operation uses HVLP spray applicators rather than flow coaters. Therefore, HVLP spray applicators shall replace flow coaters in Condition D.3.1. The calculations were done

with the proper 75.0% transfer efficiency.

Compliance with the emission limit shall be demonstrated at the end of each month in order to make the requirements of 326 IAC 8-1-6 not applicable. The calculation of the monthly VOC emissions is based upon a calendar month as opposed to the "15th of the next month". The actual records must be available after the last day of the month, and the quarterly report to show compliance with Condition D.3.1 must be submitted within thirty (30) days after the end of the quarter. Therefore, the additional suggested wording is not necessary for defining when the calculation must be performed.

Condition D.3.1 shall be reworded as follows:

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

The VOC content delivered to the ~~flow coaters~~ **HVLP spray applicators** of the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

Comment 2:

Conditions D.3.4 and D.4.10: Require a Preventive Maintenance Plan for the listed facilities and many control devices while the underlying rule, 326 IAC 1-6-3. Preventive Maintenance Plans, limits the requirement to emission control devices when requesting the "Identification of the individual(s) responsible for inspecting, maintaining and repairing emission control devices" be included in the Preventive Maintenance Plan. Please revise this condition as follows:

"A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for any control devices."

Response 2:

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. Pursuant to 326 IAC 1-6-3(b), as deemed necessary by the commissioner, any

person operating a facility required to obtain a permit under 326 IAC 2-5.1 shall comply with the requirements of subsection 326 IAC 1-6-3(a). Therefore, Conditions D.3.4 and D.4.10 shall remain unchanged.

Comment 3:

Condition D.3.6(b) Monitoring: We would request the addition of "weather permitting" to preclude the necessity of placing an employee in a dangerous situation by requiring them to climb on the roof in icy or otherwise unsafe conditions. The following is the section with the suggested changes made.

"Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground, weather permitting."

Response 3:

The phrase "weather permitting" has been incorporated in Condition D.3.6 as follows:

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 Stacks 3, 4 and 6 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 deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground**, weather permitting**. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 4:

Condition D.3.7(a)(2): Requires daily records whereas Condition D.3.7(a) states records "shall be taken monthly". We request that the phrase "on daily basis" be removed from Condition D.3.7(a)(2).

We also request that (a)(2)(B) be stricken because there is no related limit requiring emissions from the coatings and the solvent be separated. The following is the section with the suggested changes made.

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be

taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

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

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

(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.

Response 4:

Condition D.3.7 shall be revised as follows:

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

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

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

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

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~

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

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

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

(c) To document compliance with Condition D.3.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

Comment 5:

Condition D.4.8(b)(2): Lists the flat panel molding operation as being subject to 40 CFR 65 Subpart WWWW. The flat press pressure molding operation involves combining a heat activated resin coated fiberglass matting with other materials to form flat acoustical panels. This heat activated resin does not contain any styrene. Based on the definitions listed in 40 CFR 65 Subpart WWW *"Where the source category is limited to those resins and get coats which contain styrene, either by*

itself or with a combination of other monomers or solvents", the flat panel molding operation is not subject to these restrictions. We request that this process be stricken from this section.

Response 5:

The IDEM, OAQ, agrees that the one (1) flat panel molding operation is not subject to 40 CFR Part 63.5805, Subpart WWWW (National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production) as stated in the comment. Therefore, Condition D.4.8 shall be revised as follows:

D.4.8 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

(a) The miscellaneous resin/gelcoating operation that is part of the reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

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

~~(1)~~ One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour~~; and~~**.**

~~(2) One (1) flat panel molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts per hour.~~

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.

Comment 6:

Condition D.4.12(a)(2) Record Keeping Requirements: Requires a log of the dates of use while Condition D.4.12(a) requires records be taken monthly. Suggested language follows:

(2) A log of the months of use;

Response 6:

Compliance with the HAP monomer content limits in Condition D.4.1 shall be demonstrated on a monthly basis. Therefore, Condition D.4.12 shall be revised as follows:

D.4.12 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) A log of the ~~dates~~ **months** 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.4.3, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Condition D.4.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP emission limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) A copy of all notifications and reports referenced in Table 7 of 40 CFR 63, Subpart VVVV.

(2) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight percent. For open molding production resin and tooling resin, the Permittee must record the amount of each applied by atomized and nonatomized methods.

(d) To document compliance with Condition D.4.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

issued June 25, 2004

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for Part 70 Significant Source and Significant Permit Modifications

Source Background and Description

Source Name:	**Paragon Plastics, L.L.C.**
Source Location:	**301 North Taylor Road, Garrett, Indiana 46738**
County:	**DeKalb**
SIC Code:	**3089**
Operation Permit No.:	**T 033-7084-00046**
Operation Permit Issuance Date:	**December 30, 1999**
Significant Source Modification No.:	**033-18112-00046**
Significant Permit Modification No.:	**033-18477-00046**
Permit Reviewer:	**Stephanie A. Ryan**

The Office of Air Quality (OAQ) has reviewed a modification application from Paragon Plastics, L.L.C. relating to the construction and operation of the following emission units and pollution control devices:

Note that the one (1) paintbooth operation and the one (1) gel coat and resin operation, both identified as EU-03, will be constructed as part of a phased construction project after the issuance of this significant source modification. Within eighteen (18) months of issuance, construction will begin on the one (1) paintbooth operation, identified as EU-05. The one (1) paintbooth operation and the one (1) gel coat and resin operation, both identified as EU-03, will be phased into the one (1) paintbooth operation, identified as EU-05. After the one (1) paintbooth operation (EU-05) is constructed, two (2) separate facilities will exist for the one (1) paintbooth operation, identified as EU-05, and the one (1) gel coat and resin facility, identified as EU-03.

Paragon Plastics, L.L.C. is adding the following equipment in order to manufacture boats in addition to other miscellaneous fiberglass parts.

(a) One (1) abrasive blasting operation, identified as EU-02, equipped with dry filters for particulate control, to be constructed in 2004, capacity: 0.5 parts per hour.

(b) One (1) paintbooth operation, identified as EU-03, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stacks 03A and 03B, to be constructed in 2004, capacity: 5.495 parts per hour.

(c) One (1) paintbooth operation, identified as EU-05, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack 06, to be constructed in 2004, capacity: 5.495 parts per hour.

(d) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(e) One (1) flat panel (pressure) molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts per hour.

(f) The following insignificant activities:

(1) One (1) trim cutting booth, identified as EU-04, to be constructed in 2004, capacity: 5.495 parts per hour. [326 IAC 6-3-2]

(2) Infrared cure equipment.

(3) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

History

On October 24, 2003, Paragon Plastics, L.L.C. submitted an application to the OAQ requesting to add an abrasive blasting booth, a flat panel molding facility and a gelcoat/paint booth that will be phased into a separate gelcoat booth and a separate paint booth. Paragon Plastics, L.L.C. was issued T 033-7084-00046 on December 30, 1999.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Stack 03A	gelcoats and paintbooth operations	25.0	2.00	7,500	70.0
Stack 03B	gelcoats and paintbooth operations	25.0	2.00	7,500	70.0
Stack 04A	gelcoats and resins operations	25.0	2.25	13,000	70.0
Stack 04B	gelcoats and resins operations	25.0	2.25	13,000	70.0
Stack 04C	gelcoats and resins operations	25.0	2.25	13,000	70.0
Stack 06	paintbooth operation	25.0	1.00	13,000	70.0

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Permit Modifications 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 October 24, 2003. Additional information was received on December 18, 2003, December 30, 2003, February 13, 2004, March 1, 2004 and March 8, 2004.

Emission Calculations

See pages 1 though 6 of 6 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of 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 PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	50.7
PM_{10}	49.9
SO_2	0.00
VOC	70.8
CO	0.00
NO_X	0.00

HAPs	**Potential To Emit** (tons/year)
Styrene	25.5
MMA	2.25
Toluene	0.598
Xylene	0.854
MEK	2.62
Hexamethylene Diisocyanate	0.090
Formaldehyde	3.90
Phenol	8.98
Ammonia	5.46
TOTAL	50.3

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4), since the potential to emit VOC, PM and PM_{10} is greater than twenty-five (25) tons per year for each pollutant. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 033-18477-00046) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in DeKalb 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. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) DeKalb County has been classified as attainment or unclassifiable for all 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 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset 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	0.00
PM_{10}	0.00

Pollutant	**Emissions** (tons/year)
SO_2	0.00
VOC	less than 25
CO	0.00
NO_X	0.00

(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 TSD to T 033-7084-00046, issued on December 30, 1999.

Potential to Emit of Modification After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Paintbooth Operation (EU-03 and EU-05)	0.950	0.950	0.00	Less than 25.0	0.00	0.00	4.16
Gelcoat and Resin Operation (EU-03)	0.457	0.457	0.00	27.8	0.00	0.00	27.8
Pressure Molding Operation (EU-06)	0.00	0.00	0.00	12.9	0.00	0.00	18.3
Abrasive Blasting (EU-02)	2.41	2.41	0.00	0.00	0.00	0.00	0.00
Total Emissions	7.16	7.16	0.00	Less than 65.7	0.00	0.00	50.3
PSD Threshold Level	250	250	250	250	250	250	-

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

Note that the PM and PM_{10} emission rate for the one (1) abrasive blasting operation, identified as EU-02, reflects the allowable emission rate pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes.)

Federal Rule Applicability

(a) This significant modification does not involve a pollutant-specific emissions unit with the potential to emit before control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

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

(c) One (1) boat deck and hull manufacturing operation, which is part of the one (1) gelcoat and resin operation, identified as EU-03, is not subject to the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair, 40 CFR 63, Subpart II, because the source only manufactures small pleasure crafts.

(d) One (1) boat deck and hull manufacturing operations, which is part of the one (1) gelcoat and resin operation, identified as EU-03, is subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR 63, Subpart VVVV because the source manufactures fiberglass boats and it is a major source for HAPs. Pursuant to this rule, the source shall be limited by the following equation:

$$\text{HAP Limit} = [46(M_R)+159(M_{PG})+291(M_{CG})+54(M_{TR})+214(M_{TG})]$$

Where:

M_R = mass of production resin used in the past twelve (12) months, megagrams;

M_{PG} = mass of pigmented gel coat used in the past twelve (12) months, megagrams;

M_{CG} = mass of clear gel coat used in the past twelve (12) months, megagrams;

M_{TR} = mass of tooling resin used in the past twelve (12) months, megagrams; and

M_{TG} = mass of tooling gel coat used in the past twelve (12) months, megagrams.

This limitation is based on a twelve (12) month rolling average period beginning on August 23, 2004.

(e) The one (1) miscellaneous resin/gelcoating operation, which is part of the one (1) gel coat and resin operation, identified as EU-03, is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW because the source operates a reinforced plastic composites production facility and it is a major source for HAPs. 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.

(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 sixty (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 sixty (60) calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(f) The reinforced plastic composites production operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP, because the operations are already subject to the provisions of 40 CFR 63, Subpart WWWW. The source is therefore not subject to the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56.)

State Rule Applicability - Individual Facilities

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

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

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

Pursuant to 326 IAC 2-4.1-1(b)(2), the proposed facilities are not subject to the requirements of 326 IAC 2-4.1-1 because these operations are already regulated by Section 112(d) of the Clean Air Act (CAA).

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

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

The particulate matter (PM) for the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be limited by the following:

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

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

(b) Pursuant to 326 IAC 6-3-2(d), particulate for the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(c) Pursuant to 326 IAC 6-3-2(e)(2), the particulate from the one (1) abrasive blasting operation, identified as EU-02, shall not exceed 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour. The unrestricted potential to emit particulate from the one (1) abrasive blasting operation is 2.74 pounds per hour and the controlled potential to emit particulate is 0.008 pounds per hour. Therefore, the dry filters shall be in operation at all times the abrasive blasting is in operation in order to comply with this rule.

(d) Pursuant to 326 IAC 6-3-1(b)(7), the one (1) gelcoat and resin operation, identified as EU-03, is not subject to the requirements of 326 IAC 6-3-2 because the one (1) gelcoat and resin operation uses flow coaters for the application of gelcoats and resins.

(e) The one (1) flat panel molding operation, identified as EU-06, is not subject to the requirements of 326 IAC 6-3-2 because the one (1) flat panel molding operation has no particulate emissions.

(f) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) trim cutting booth, identified as EU-04, is not subject to the requirements of 326 IAC 6-3-2 because the one (1) trim cutting booth has potential emissions less than 0.551 pound per hour.

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

(a) The one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05 has potential VOC emissions greater than twenty-five (25) tons per year. Since the VOC emissions from the one (1) paintbooth operation are limited to less than twenty-five (25) tons per year, this operation is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

(b) The one (1) gelcoat and resin operation, identified as EU-03, has the potential to emit VOC less than twenty-five (25) tons per year and therefore it is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-2 (Surface Coating Emission Limitations)

The proposed facilities are not subject to the requirements of 326 IAC 8-2 (Surface Coating Emission Limitations) because these facilities surface coat fiberglass.

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

(a) The one (1) gel coat and resin operation, identified as EU-03, is subject to the requirements of 326 IAC 20-25 because it has 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 meets all of the following criteria:

(1) The source manufactures reinforced plastics composites parts, products, or watercraft;

(2) The source includes an emission unit where resins and gelcoats that contain styrene are applied and cured using the open molding process; and

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

(b) Pursuant to 326 IAC 20-25-3, on or before January 1, 2002, resins and gelcoats used shall be limited to the maximum HAP monomer contents listed in the following tables, or their equivalent, on an emissions mass basis, depending on the application method and products produced:

TABLE I Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
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

TABLE I Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
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.

TABLE II Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

*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 gelcoats 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 sub-section(b) by the use of resins or gelcoats 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, lower monomer content resins and gelcoats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gelcoats 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

(c) The following categories of materials in subsection (b) 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 technology, 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.

(d) Unless specified in subsection (c), 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).

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

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.

(B) All production and tooling gelcoats that contain HAPs.

(C) Waste resins and gelcoats that contain HAPs.

(D) Cleaning materials, including waste cleaning materials.

(E) Other materials that contain HAPs.

(7) 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.

(f) 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:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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.

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.

(g) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.

(2) Address of the physical location.

(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

Compliance Requirements

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

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

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

(a) The one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, has applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the paintbooth operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the paintbooth is 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the paintbooth operation stack exhausts, for 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 an overspray emission, evidence of overspray emission, or other abnormal 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

(b) The one (1) gelcoat and resin operation has no applicable compliance monitoring conditions because the operation utilizes flow coaters for the application of gelcoats and resins and therefore there are no overspray emissions.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

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

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

(a) Nine closed molding presses, identified as EU-01, with a maximum capacity of 180 Parts per hour, exhausting to GV-1.

(b) One (1) abrasive blasting operation, identified as EU-02, equipped with dry filters for particulate control, to be constructed in 2004, capacity: 0.5 parts per hour.

(c) One (1) paintbooth operation, identified as EU-03, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stacks 03A and 03B, to be constructed in 2004, capacity: 5.495 parts per hour.

(d) One (1) paintbooth operation, identified as EU-05, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack 06, to be constructed in 2004, capacity: 5.495 parts per hour.

(e) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(f) One (1) flat panel (pressure) molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts per hour.

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

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

(a) One (1) trim cutting booth, identified as EU-04, to be constructed in 2004, capacity: 5.495 parts per hour. [326 IAC 6-3-2]

(b) Infrared cure equipment.

(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

~~(a)~~**(d)** Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

~~(b)~~**(e)** Forced and induced draft cooling tower system not regulated under a NESHAP.

~~(c)~~**(f)** Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

~~(d)~~**(g)** Paved and unpaved roads and parking lots with public access.

~~(e)~~**(h)** Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

~~(f)~~**(i)** Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

B.26 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this significant source modification to Part 70 Operating Permit 033-7084-00046 if the:

(a) Construction of the one (1) paintbooth operation, identified as EU-03, has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the one (1) paintbooth operation, identified as EU-03, work is suspended for a continuous period of one (1) year or more.

(b) Construction of the one (1) paintbooth operation, identified as EU-05, has not begun within twelve (12) months after the operation of the one (1) paintbooth operation, identified as EU-03, or if during the construction of the one (1) paintbooth operation, identified as EU-05, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) abrasive blasting operation, identified as EU-02, equipped with dry filters for particulate control, to be constructed in 2004, capacity: 0.5 parts 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]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) abrasive blasting operation shall not exceed 0.551 pounds per hour when operating at a process weight rate less than one hundred (100) pounds per hour.

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the dry filters for particulate control shall be in operation and control emissions from the one (1) abrasive blasting operation at all times that the abrasive blasting is in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) One (1) paintbooth operation, identified as EU-03, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stacks 03A and 03B, to be constructed in 2004, capacity: 5.495 parts per hour.

(d) One (1) paintbooth operation, identified as EU-05, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack 06, to be constructed in 2004, capacity: 5.495 parts 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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to the flow coaters of the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

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

Pursuant to 40 CFR 52, Subpart P, the PM from the one (1) paintbooth operation, identified as EU-03, which will be phased into the one (1) paintbooth operation, identified as EU-05, 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 these facilities and any control devices.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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 Stacks 03A, 03B and 06 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 deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [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, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

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

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

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

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

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

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

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

(c) To document compliance with Condition D.3.6, the Permittee shall maintain records of the inspections noted, and any additional inspections prescribed by the Preventive Maintenance Plan.

D.3.8 Reporting Requirements

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

SECTION D.4 FACILITY OPERATION CONDITION

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

(e) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(f) One (1) flat panel (pressure) molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts 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.4.1 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the one (1) gelcoat and resin 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 Except Watercraft	HAP Monomer Content, Weight Percent
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

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
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).

Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

* 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.4.8(a) is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging <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 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 gelcoat
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.4.2 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.4.3 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.4.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) **The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.**

(b) **Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.**

D.4.5 Emissions Standards for Open Molding Resin and Gel Coat Operations [40 CFR 63, Subpart VVVV]]

Pursuant to 40 CFR 63.5698, the total organic HAP emissions from the boat deck and hull manufacturing operation that is part of the open molding operations shall be limited by the following equation:

HAP Limit = $[46(M_R)+159(M_{PG})+291(M_{CG})+54(M_{TR})+214(M_{TG})]$

Where:

M_R = mass of production resin used in the past twelve (12) months, megagrams;

M_{PG} = mass of pigmented gel coat used in the past twelve (12) months, megagrams;

M_{CG} = mass of clear gel coat used in the past twelve (12) months, megagrams;

M_{TR} = mass of tooling resin used in the past twelve (12) months, megagrams; and

M_{TG} = mass of tooling gel coat used in the past twelve (12) months, megagrams.

This limitation is based on a twelve (12) month rolling average period beginning on August 23, 2004.

D.4.6 Standards for Resin and Gel Coat Mixing Operations [40 CFR 63.5731]

Pursuant to 40 CFR 63.5731, the following work practice standards shall be implemented:

(a) **All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters must have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.**

(b) **In order to show compliance with Condition D.4.6(a), the Permittee shall make monthly visual inspections to ensure that all containers have covers with no visible gaps between the cover and container, or between the cover and equipment passing through the cover.**

(c) The Permittee shall maintain records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

D.4.7 Standards for Resin and Gel Coat Application Equipment Cleaning Operations [40 CFR 63.5734]

Pursuant to 40 CFR 63.5734, the following work practice standards shall be implemented:

(a) For routine flushing of resin and gel coat application equipment, the Permittee must use a cleaning solvent that contains no more than five percent (5%) organic HAP by weight. No organic HAP content limit applies for removing cured resin or gel coat from the application equipment.

(b) Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container.

(c) On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

D.4.8 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]

(a) The miscellaneous resin/gelcoating operation that is part of the reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

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

(1) One (1) gel coat and resin operation, identified as EU-03, equipped with flow coaters, consisting of a miscellaneous resin/gelcoating operation and a boat deck and hull manufacturing operation, exhausting to Stacks 03A, 03B, 04A, 04B and 04C, to be constructed in 2004, capacity: 5.495 parts per hour.

(2) One (1) flat panel molding operation, identified as EU-06, to be constructed in 2004, capacity: 5.495 parts per hour.

(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.

D.4.9 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.4.10 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 any control devices.

Compliance Determination Requirements

D.4.11 Hazardous Air Pollutants (HAPs) [40 CFR 63.5701]

Compliance with the HAP emission limitations in Condition D.4.5 using emissions averaging shall be determined by the following:

(a) Pursuant to 40 CFR 63.5758, the Permittee must determine the organic HAP content for each material used in the open molding and resin and gel coat operation using one (1) of the following methods:

(1) Method 311 (appendix A to 40 CFR 63)

(2) Method 24 (appendix A to 40 CFR 60)

(3) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)

(b) Compliance using emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month beginning on August 23, 2004.

(1) At the end of the twelfth month following August 23, 2004 and at the end of every subsequent month, compliance with Condition D.4.5 shall be demonstrated using the following equation:

$$\text{HAP emissions} = [(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$$

Where:

PV_R = Weighted-average MACT model point value for production resin used in the past twelve (12) months, kilograms per megagram;

M_R = Mass of production resin used in the past twelve (12) months, megagrams;

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past twelve (12) months, kilograms per megagram;

M_{PG} = Mass of pigmented gel coat used in the past twelve (12) months, megagrams;

PV_{CG} = Weighted-average MACT model point value for clear coat used in the past twelve (12) months, kilograms per megagram;

M_{CG} = Mass of clear gel coat used in the past twelve (12) months, megagrams;

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past twelve (12) months, kilograms per megagram;

M_{TR} = Mass of tooling resin used in the past twelve (12) months, megagrams;

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past twelve (12) months, kilograms per megagram; and

M_{TG} = Mass of tooling gel coat used in the past twelve (12) months, megagrams.

(2) At the end of every month, the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average shall be calculated as follows:

$$PV_{OP} = 3(M_i\ PV_i) / 3(M_i)$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation included in the average, kilograms of HAP per megagram of material applied;

M_i = mass of individual resin or gelcoat used within an operation in the past twelve (12) months, megagrams; and

PV_i = the MACT model point value for individual resin or gel coat used within an operation in the past twelve (12) months, kilograms of HAP per megagram of material applied.

(3) The MACT model point value (PV_i) for each resin and gel coat used in each operation in the past twelve (12) months shall be calculated using the following equation:

$$PV_i = 0.014 \times (\text{Resin HAP } \%)^{2.275}$$

(c) The following records must be kept for each gel coat and resin:

(1) Hazardous air pollutant content.

(2) Amount of material used per month.

(3) Calculations performed to demonstrate compliance based on MACT model point values.

(d) The Permittee must prepare and submit the implementation plan to the Administrator as specified in 40 CFR 63.5707.

(e) The Permittee must submit semiannual compliance reports to the Administrator as specified in 40 CFR 63.5764.

Record Keeping and Reporting Requirements

D.4.12 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(b) To document compliance with Condition D.4.3, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Condition D.4.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP emission limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:

(1) A copy of all notifications and reports referenced in Table 7 of 40 CFR 63, Subpart VVVV.

(2) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight percent. For open molding production resin and tooling resin, the Permittee must record the amount of each applied by atomized and non-atomized methods.

(d) To document compliance with Condition D.4.10, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.4.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.

(c) The significant permit modification application shall be submitted to:

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

D.4.14 Reporting Requirements [40 CFR 63.5764]

(a) The Permittee must submit compliance reports by the following dates:

(1) The first compliance report must cover the period of August 23, 2005 through December 31, 2005.

(2) The first compliance report must be postmarked or delivered no later than March 1, 2006.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from July 1 through December 31 of each year.

(4) Each subsequent compliance report must be postmarked or delivered no later than March 1 of the following year.

(b) The compliance report must include the following information:

(1) Source name and address.

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

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

(4) A description of any changes in the manufacturing process since the last compliance period.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT

model point value averaging provision with which the source is complying. The statement or table must also show the actual weighted-average MACT model point value, if applicable, for each operation during each of the rolling twelve (12) month averaging periods that end during the reporting period.

(6) The Permittee must provide a statement verifying If the source was in compliance with emission limits and work practice standards during the reporting period.

(7) If the source deviated from an emission limit or work practice standard during the reporting period, the Permittee must include the following information:

(A) A description of the operation involved in the deviation.

(B) The quantity, organic HAP content, and application method of the materials involved in the deviation.

(C) A description of any corrective action taken to minimize the deviation.

(D) A statement of whether or not the facility was in compliance for the twelve (12) month averaging period that ended at the end of the reporting period.

D.4.15 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.4.1(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).

SECTION D.5 FACILITY OPERATION CONDITION

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

(a) One (1) trim cutting booth, identified as EU-04, to be constructed in 2004, capacity: 5.495 parts per hour. [326 IAC 6-3-2]

(b) Infrared cure equipment.

(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

~~(a)~~**(d)** Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

~~(b)~~**(e)** Forced and induced draft cooling tower system not regulated under a NESHAP.

~~(c)~~**(f)** Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

~~(d)~~**(g)** Paved and unpaved roads and parking lots with public access.

~~(e)~~**(h)** Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

~~(f)~~**(i)** Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

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

There are no applicable rules for these insignificant activities.

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

Part 70 Quarterly Report

Source Name: **Paragon Plastics, L.L.C.**
Source Address: **301 North Taylor Road, Garrett, Indiana 46738**
Mailing Address: **P.O. Box 119, Garrett, Indiana 46738**
Part 70 Permit No.: **T 033-7084-00046**
Facility: **Paintbooth Operations**
Parameter: **VOC**
Limit: **total of less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month**

YEAR: _____

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

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____

Title / Position:_____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Paragon Plastics, L.L.C.
Source Address: 301 North Taylor Road, Garrett, Indiana 46738
Mailing Address: P.O. Box 119, Garrett, Indiana 46738
Part 70 Permit No.: 033-7084-00046

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-18112-00046, and the attached proposed Part 70 Significant Permit Modification No. 003-18477-00046.

Appendix A: Emissions Calculations
Reinforced Plastics and Composites

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

Material	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Transfer Efficiency	Control Efficiency	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Controlled PM tons per year	Tons of Styrene per year	Tons of MMA per year
RESINS																
Miscellaneous Operations																
Press Resin	9.16	46.7%	0.00%	115	0.00	0.248	5.495	100%	90.0%	0.718	17.2	3.14	0.00	0.00	3.14	0.00
Unsaturated Polyester Resin	10.7	36.9%	0.00%	83.0	0.00	0.00	5.495	100%	90.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vinyl Ester Resin	9.16	35.0%	0.00%	77.0	0.00	0.00	5.495	100%	90.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Composites One 1001-15	8.69	43.6%	0.00%	105	0.00	0.017	5.495	100%	99.7%	0.043	1.02	0.187	0.00	0.00	0.187	0.00
Corrosion, Iso Resin	8.88	46.6%	0.00%	115	0.00	0.024	5.495	100%	99.7%	0.067	1.62	0.295	0.00	0.00	0.295	0.00
DCPD Laminating Resin-260	9.25	30.05%	0.00%	64.0	0.00	0.212	5.495	100%	99.7%	0.345	8.28	1.51	0.00	0.00	1.51	0.00
DCPD Laminating Resin-250	9.16	29.9%	0.00%	64.0	0.00	0.131	5.495	100%	99.7%	0.211	5.06	0.924	0.00	0.00	0.924	0.00
Polyester Resin Solution in Styrene	9.16	35.0%	0.00%	77.0	0.00	0.079	5.495	100%	99.7%	0.153	3.67	0.671	0.00	0.00	0.671	0.00
Deck Operations																
Stypol LSPC-3200	8.93	33.57%	0.00%	74.0	0.00	14.6	0.050	100%	90.0%	0.241	5.79	1.06	0.00	0.00	1.06	0.00
Stypol LSPC-2500	8.93	33.56%	0.00%	74.0	0.00	26.529	0.050	100%	99.7%	0.438	10.5	1.92	0.00	0.00	1.92	0.00
Poly Based Pumpable Gen. Purp.	9.00	24.4%	0.00%	51.0	0.00	0.00	0.050	100%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Flexible Med Gray Sanding	10.83	34.76%	0.00%	77.0	0.00	0.00	0.050	100%	99.7%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spraycore 2000-OS	5.80	36.0%	0.00%	80.0	0.00	14.717	0.000	100%	99.7%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hull Operations																
Stypol 073-5632	13.40	34.62%	0.00%	77.0	0.0	6.178	0.050	100%	97.0%	0.159	3.82	0.698	0.00	0.00	0.698	0.00
Spraycore 2000-OS	5.80	36.0%	0.00%	80.0	0.0	8.295	0.050	100%	97.0%	0.096	2.31	0.421	0.00	0.00	0.421	0.00
Stypol LSPC-3200	8.93	33.57%	0.00%	74.0	0.0	42.539	0.050	100%	97.0%	0.703	16.9	3.08	0.00	0.00	3.08	0.00
									Subtotal	**3.17**	**76.2**	**13.9**	**0.00**	**0.00**	**13.9**	**0.00**

Continued on Page 2 of 6.

Appendix A: Emissions Calculations
Reinforced Plastics and Composites

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

Material	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Transfer Efficiency	Control Efficiency	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Controlled PM tons per year	Tons of Styrene per year	Tons of MMA per year
GELCOATS																
Miscellaneous Operations																
5L-22 Yellow	10.23	39.28%	0.00%	418	0.00	0.00	5.495	100%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
White Sanding Gelcoat	11.54	31.01%	0.00%	276	0.00	0.022	5.495	100%	97.0%	0.193	4.62	0.843	0.00	0.00	0.843	0.00
Gel Coat TG-3081	8.33	37.0%	9.90%	377	150	0.022	5.495	100%	97.0%	0.265	6.37	1.16	0.00	0.00	0.831	0.331
Hard White Gelcoat	11.04	35.47%	0.00%	356	0.00	0.073	5.495	100%	97.0%	0.788	18.9	3.45	0.00	0.00	3.45	0.00
Polycor	9.00	43.65%	4.46%	522	75.0	0.00	5.495	100%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Polycor Gray	10.38	32.71%	4.70%	294	75.0	0.015	5.495	100%	97.0%	0.158	3.79	0.691	0.00	0.00	0.551	0.141
PRS in Styrene Type SS3	9.16	42.0%	0.00%	481	0.00	0.00	5.495	100%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel Coat WG-3704	8.33	32.0%	9.90%	285	150	0.027	5.495	100%	97.0%	0.269	6.45	1.18	0.00	0.00	0.771	0.406
Bucket Gray Gel Coat	12.5	40.0%	0.00%	439	0.00	0.016	5.495	100%	97.0%	0.241	5.79	1.06	0.00	0.00	1.06	0.00
Deck Operations																
ArmorFlex Polar White	11.22	19.27%	8.46%	172	75.3	7.993	0.050	75.0%	90.0%	0.554	13.3	2.43	3.55	0.355	1.69	0.739
Gel Coat Yellow	9.76	35.29%	4.19%	336	37.3	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel Coat Black	9.66	38.18%	4.82%	398	42.9	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Polycor Gray	10.38	32.71%	4.70%	294	42.8	0.867	0.050	75.0%	97.0%	0.076	1.82	0.332	0.308	0.009	0.290	0.042
Gel Coat Plum	9.70	37.05%	4.56%	377	41.5	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel Coat Red	9.67	36.25%	4.33%	356	39.4	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel Coat Green	9.71	36.05%	4.43%	356	40.3	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gel Coat Moon Rock	9.98	36.31%	4.53%	356	41.2	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Blue Gel Coat	9.69	36.47%	4.47%	377	40.7	0.00	0.050	75.0%	97.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hull Operations																
AmorFlex Polar White	11.22	19.27%	8.46%	175	80.0	4.478	0.050	75.0%	97.0%	0.320	7.69	1.40	1.99	0.060	0.963	0.440
Gel Coat Electric Blue	9.90	36.36%	4.46%	356	40.6	1.516	0.050	75.0%	97.0%	0.149	3.57	0.652	0.486	0.015	0.585	0.067
Polycor Gray	10.38	32.71%	4.70%	294	42.8	1.734	0.050	75.0%	97.0%	0.152	3.64	0.664	0.617	0.019	0.579	0.084
									Subtotal	**3.16**	**76.0**	**13.9**	**6.95**	**0.457**	**11.6**	**2.25**
									Overall Total	**6.34**	**152**	**27.8**	**6.95**	**0.457**	**25.5**	**2.25**
															Total HAPs	**27.8**

METHODOLOGY

Potential VOC From Resins/Gel, Pounds per Hour =Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) *[Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)]*(1 ton/2000 lbs)
Potential VOC From Resins/Gel, Pounds per Day =Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000 lbs)
Potential VOC From Resins/Gel, Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) *[Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)]*(1 ton/2000lbs)
Potential VOC From Solvents, Pounds per Hour =Density (lb/gal)*(Weight % Organics)*Gal of Material (gal/unit) * Maximum (unit/hr)
Potential VOC From Solvents, Pounds per Day =Density (lb/gal) *(Weight % Organics)* Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)
Potential VOC From Solvents, Tons per Year = Density (lb/gal)*(Weight % Organics)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)
PM, tons per year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (1- Weight % Styrene - Weight % MMA) * (1 - Transfer Efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
Styrene emissions, tons per year = Density (lb/gal) *Gal of Material (gal/unit) * Maximum (units/hr) * Styrene Emission Factor (lb/ton) * (1 ton Styrene / 2000 lbs Styrene) * (8760 hr/yr) * (1 ton/2000 lbs)
MMA emissions, tons per year = Density (lb/gal) *Gal of Material (gal/unit) * Maximum (units/hr) * MMA Emission Factor (lb/ton) * (1 ton MMA / 2000 lbs MMA) * (8760 hr/yr) * (1 ton/2000 lbs)
Emission Factors (lbs Styrene or MMA / ton resin or gelcoat) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Appendix A: Emissions Calculations
Flat Press Pressure Molding EU-06

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

Emission Factors (lbs/lb material processed)

Formaldehyde	0.001
Phenol	0.0023
Ammonia	0.0014

Press Number	Rate (lb/hr)	Pounds of Formaldehyde per hour	Pounds of Phenol per hour	Pounds of Ammonia per hour	Pounds of VOC per hour
Press 001	200	0.200	0.460	0.280	0.660
Press 102	200	0.200	0.460	0.280	0.660
Press 103	95.0	0.095	0.219	0.133	0.314
Press 013	95.0	0.095	0.219	0.133	0.314
Press 26B	60.0	0.060	0.138	0.084	0.198
Press 26C	60.0	0.060	0.138	0.084	0.198
Press 207	60.0	0.060	0.138	0.084	0.198
Press 104	121	0.121	0.278	0.169	0.399
Total Actual Emissions (lbs/hr)		**0.891**	**2.05**	**1.25**	**2.94**
Total Actual Emissions (tons/year)		**0.891**	**2.05**	**1.25**	**2.94**
Total Potential Emissions (tons/year)		**3.90**	**8.98**	**5.46**	**12.9**

METHODOLOGY

Pounds of Formaldehyde per hour = Formaldehyde Emission Factor (lbs/bl) x Rate (lb/hr)
Pounds of Phenol per hour = Phenol Emission Factor (lbs/bl) x Rate (lb/hr)
Pounds of Ammonia per hour = Ammonia Emission Factor (lbs/bl) x Rate (lb/hr)
Pounds of VOC per hour = Pounds of Formaldehyde per hour + Pounds of Phenol per hour
Total Actual Emissions (tons/year) = Total Actual Emissions x (2000 hours of operation / 2000 pounds per ton)
Total Potential Emissions (tons/year) = Total Actual Emissions x (8760 total hrs per year / 2000 pounds per ton)

Appendix A: Emissions Calculations
VOC, Particulate and HAP Emissions From Surface Coating

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

VOC and Particulate Emissions

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
EU-03 phased into EU-05																
Sherwin Williams Polane	9.34	9.96%	0.00%	10.0%	0.00%	88.0%	0.200	5.495	0.930	0.930	1.02	24.5	4.48	10.1	1.06	75.0%
Dupont IMRON	11.09	23.78%	1.20%	22.6%	0.0178%	42.21%	0.200	5.495	2.50	2.50	2.75	66.0	12.1	10.2	5.93	75.0%
Dupont IMRON Primer	11.75	25.23%	1.20%	24.0%	0.0166%	61.3%	0.200	5.495	2.82	2.82	3.10	74.5	13.6	10.6	4.61	75.0%
Deck																
Nida-Core HSPP Honeycomb-38508	10.7	0.00%	0.00%	0.00%	0.00%	0.00%	1.317	0.050	0.00	0.00	0.00	0.00	0.00	0.772	N/A	75.0%
Complex Reinforcements	21.66	0.400%	0.00%	0.400%	0.00%	0.00%	0.00	0.050	0.087	0.087	0.00	0.00	0.00	0.00	N/A	75.0%
Saint-Gobain Vetrotex	21.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.050	0.00	0.00	0.00	0.00	0.00	0.00	N/A	75.0%
Chopped Strand	21.66	0.400%	0.00%	0.400%	0.00%	0.00%	0.00	0.050	0.087	0.087	0.00	0.00	0.00	0.00	N/A	75.0%
Woven Fiberglass Fabric-35337	21.66	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.050	0.00	0.00	0.00	0.00	0.00	0.00	N/A	75.0%
Nida-Core H8PP Honeycomb-39496	0.6417	0.00%	0.00%	0.00%	0.00%	0.00%	1.00	0.050	0.00	0.00	0.00	0.00	0.00	0.035	N/A	75.0%
Luperdox	8.32	98.0%	0.700%	97.3%	0.700%	0.00%	0.00	0.050	8.15	8.10	0.00	0.00	0.00	0.00	N/A	75.0%
Luperdox DDM-9	8.36	98.0%	0.700%	97.3%	0.700%	0.00%	0.00	0.050	8.19	8.13	0.00	0.00	0.00	0.00	N/A	75.0%

PM Control Efficiency: 97.0%

State Potential Emissions **Add worst case coating to all solvents**

Uncontrolled	**6.88**	**165**	**30.1**	**31.7**
Controlled	**5.86**	**165**	**30.1**	**0.950**

HAP Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexamethylene Diisocyanate	Weight % Toluene	Weight % Xylene	Weight % MEK	Hexamethylene Diisocyanate Emissions (tons/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)
Sherwin Williams Polane	9.34	0.200	5.495	0.200%	0.00%	0.00%	0.00%	0.090	0.00	0.00	0.00
Dupont IMRON	11.09	0.200	5.495	0.00%	1.12%	1.60%	0.00%	0.00	0.598	0.854	0.00
Dupont IMRON Primer	11.75	0.200	5.495	0.00%	0.00%	0.00%	4.64%	0.00	0.00	0.00	2.62
Luperdox	8.32	0.000	0.050	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00
Luperdox DDM-9	8.36	0.000	0.050	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00
							Total	**0.090**	**0.598**	**0.854**	**2.62**

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
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: Emission Calculations
Abrasive Blasting

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
EU-02	99.7%	0.0001	9600	2.74	12.0	0.008	0.036

Methodology

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

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emission Calculations
Summary

Company Name: Paragon Plastics, LLC
Address City IN Zip: 301 North Taylor Road, Garrett, Indiana 46738
Permit No.: SSM 033-18112 and SPM 033-18477
Plt ID: 033-00046
Reviewer: Stephanie A. Ryan
Application Date: October 24, 2003

Uncontrolled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating	31.7	30.9	0.00	0.00	30.1	0.00
Resins/ Gelcoats	6.95	6.95	0.00	0.00	27.8	0.00
Pressure Molding	0.00	0.00	0.00	0.00	12.9	0.00
Abrasive Blasting	12.0	12.0	0.00	0.00	0.00	0.00
Total	**50.7**	**49.9**	**0.00**	**0.00**	**70.8**	**0.00**

Controlled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating	0.950	0.950	0.00	0.00	30.1	0.00
Resins/ Gelcoats	0.457	0.457	0.00	0.00	27.8	0.00
Pressure Molding	0.00	0.00	0.00	0.00	12.9	0.00
Abrasive Blasting	0.036	0.036	0.00	0.00	0.00	0.00
Total	**1.44**	**1.44**	**0.00**	**0.00**	**70.8**	**0.00**

HAPs Emissions (tons per year)

Facility	Styrene	MMA	Toluene	Xylene	MEK	Hexamethylene Diisocyanate
Surface Coating	0.00	0.00	0.598	0.854	2.62	0.090
Resins/ Gelcoats	25.5	2.25	0.00	0.00	0.00	0.00
Pressure Molding	0.00	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting	0.00	0.00	0.00	0.00	0.00	0.00
Total	**25.5**	**2.25**	**0.598**	**0.854**	**2.62**	**0.090**

Facility	Formaldehyde	Phenol	Ammonia	Total
Surface Coating	0.00	0.00	0.00	4.16
Resins/ Gelcoats	0.00	0.00	0.00	27.8
Pressure Molding	3.90	8.98	5.46	18.3
Abrasive Blasting	0.00	0.00	0.00	0.00
Total	**3.90**	**8.98**	**5.46**	**50.3**