



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 27, 2008
RE: Industrial Dielectrics, Inc./ 057-18496-00042
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Industrial Dielectrics, Inc.
407 South 7th Street
Noblesville, Indiana 46060**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

Operation Permit No.: T057-18496-00042	
Issued by/Original Signed By: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 27, 2008 Expiration Date: February 27, 2013

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary plastic custom compounding plant that operates fiberglass molding facilities and that produces a bulk molding compound and plastic sheets.

Source Address:	407 South 7th Street, Noblesville, IN 46060
Mailing Address:	P.O. Box 357, Noblesville, IN 46061
General Source Phone Number:	317-773-1766
SIC Code:	3087
County Location:	Hamilton
Source Location Status:	Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) mixers, identified as M₁ and M₂, constructed prior to 1980, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S₂. Under 40 CFR 63, Subpart WWWW, this is considered a closed molding reinforced plastic composites operation.
- (b) One (1) sheet molding compound mixer, identified as SMC Mixer M₃, constructed prior to 1980, for sheet molding compound production with maximum throughput of 313 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour exhausting to stack S₃, controlled by a baghouse B₈. Five hoods were added in 2007 over the doctor boxes and thickening operations; all five hoods are ducted together and are exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (d) Nine (9) bulk molding compound mixers, identified as M₅ - M₁₁ (constructed prior to 1980) and M₁₂ - M₁₃ (constructed in 1996), for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B₄, and all exhausting to stack S₄. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (e) Four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, constructed in 2005, for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉, exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (f) One (1) bulk molding compound scale, identified as SC₁, connected to mixers M₅ - M₁₃, constructed prior to 1980, for bulk molding compound production, with a maximum capacity of 900 pounds (100 pounds X 9 lines) per hour, equipped with baghouse B₄ and exhausting to stack S₄.
- (g) Two (2) saws, identified as SA₁ and SA₂, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B₁ and B₂, with no outside exhaust.
- (h) One (1) plastic sander, identified as SN₁ for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B₃, and exhausting to stack S₁.
- (i) One (1) electric oven, identified as O₁, constructed prior to 1980, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S₅.
- (j) One (1) grinder, identified as G₁, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B₇, and exhausting to stack S₆.

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) Two (2) laboratory BMC mixers, identified as M₂₁ and M₂₂, constructed in 2005, with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M₁₆ - M₁₉. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (b) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (c) One (1) Vazo blender, installed in October 2005, with a maximum capacity of 180 batches of material per year, with each batch composed of 758 pounds of raw materials. The blender is controlled by Baghouse B7. [40 CFR Part 63, Subpart WWWW]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T057-18496-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any

application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation .
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this

permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T057-18496-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated

before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5][326 IAC 2-2-2][326 IAC 2-3-2]

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1][IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or

decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 13, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit or at a source with Plantwide Applicability (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular

operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2]
[326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) mixers, identified as M₁ and M₂, constructed prior to 1980, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S₂. Under 40 CFR 63, Subpart WWWW, this is considered a closed molding reinforced plastic composites operation.
- (b) One (1) sheet molding compound mixer, identified as SMC Mixer M₃, constructed prior to 1980, for sheet molding compound production with maximum throughput of 313 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (d) Nine (9) bulk molding compound mixers, identified as M₅ - M₁₁ (constructed prior to 1980) and M₁₂ - M₁₃ (constructed in 1996), for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B₄, and all exhausting to stack S₄. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (e) Four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, constructed in 2005, for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉, exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (f) One (1) Vazo blender, installed in October 2005, with a maximum capacity of 180 batches of material per year, with each batch composed of 758 pounds of raw materials. The blender is controlled by Baghouse B7.

Insignificant Activities

- (a) Two (2) laboratory BMC mixers, identified as M₂₁ and M₂₂, constructed in 2005, with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M₁₆ - M₁₉. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (b) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
Mixing Line M ₃	0.16	1.18
Mixing Line M ₄	0.60	2.9
Mixing Line M ₁₆	0.50	2.58
Mixing Line M ₁₇	0.50	2.58
Mixing Line M ₁₈	0.50	2.58
Mixing Line M ₁₉	0.50	2.58

The pounds per hour PM limitations shall be calculated with the following equation:

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

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

D.1.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to Part 70 Permit No. 057-7683-00042, VOC emissions from M₁₂ and M₁₃ shall be limited to less than 25 tons per 12 consecutive month period, each, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable.

D.1.3 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 [40 CFR Part 64] [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.2 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 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.

(b) Compliance with Condition D.1.2 shall be determined by the following equation:

$$V * R * 1330\text{lbs/hr} * (8760\text{hr/yr}) * (1\text{ton}/2000 \text{ lbs}) * F < 25 \text{ tons/year}$$

V = VOC content of Raw Material (lbs/lb of Raw Material)
R = Raw Material % of Total Mixture
F = Flash off factor = 2%

D.1.5 Particulate Matter (PM)

- (a) The baghouse B₈ shall be in operation at all times when any of the sheet molding compound line mixer, identified as SMC Mixers M₃ and M₄ is in operation, in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.1.
- (b) The Baghouse B₉ shall be in operation at all times when any of the Bulk Molding Compound Mixing Line, identified as M₁₆ – M₁₉ is in operation in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.1.

Compliance Monitoring Requirements [326 IAC 2-7-5(3)]

D.1.6 Monitoring [40 CFR Part 64]

- (a) Daily visible emissions notations of the bulk molding compound mixers stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, “normal” means those conditions prevailing 80% of the time the process is in operation, not counting startup or shut down time. In the case of discontinuous operations, readings must be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee that has worked at the plant least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee will take reasonable steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across baghouses B4 and B9 at least once per day when the processes are in operation. If the pressure drop is outside the normal range of 3.0 to 6.0 inches of water, or a range established during the latest stack test, then the Permittee must take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside this range is a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) In the case of broken or failed bag detection in a continuously operated process, the failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. If the baghouse controls emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency as described in Section B – Emergency Provisions.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The cleanup solvent, containing VOC, usage for each month;
 - (4) The total input of bulk molding compounds materials for the fiberglass molding processes for each month; and
 - (5) 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.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.9 General Provisions Relating to NESHAP WWWW [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

D.1.10 NESHAP WWWW Requirements [40 CFR Part 63, Subpart WWWW][326 IAC 20-56]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780, which are incorporated by reference as 326 IAC 20-56, for the two mixers, identified as M₁ and M₂ (compression/closed molding), one (1) sheet molding compound mixer, identified as SMC Mixers M₃, one (1) sheet molding compound line, identified as SMC Mixer M₄, nine (9) bulk molding compound mixers, identified as M₅ – M₁₃, four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, two (2) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, two (2) insignificant laboratory BMC mixers, identified as M₂₁ and M₂₂, four (4) bulk molding compound (lab mixers identified as M₂₃ - M₂₆, cleaning of materials used in reinforced plastic composites manufacture and HAP-containing material storage, as specified as follows:

Compliance Dates and Standards

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

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

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

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

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

General Compliance Requirements

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

- (a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP

content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

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

Testing and Initial Compliance Requirements

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

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

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

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

Continuous Compliance Requirements

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

- (b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.
- (1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.
 - (2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
 - (3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.
 - (4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

- (4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.
- (b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.
- (e) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) of this section are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e).

Notifications, Reports, and Records

§ 63.5905 What notifications must I submit and when?

- (a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40CFR part 63, subpart A, referenced in Table 13 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

§ 63.5910 What reports must I submit and when?

- (a) You must submit each report in Table 14 to this subpart that applies to you.
- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
 - (1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.
 - (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.
 - (3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

- (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
 - (1) Company name and address.
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - (3) Date of the report and beginning and ending dates of the reporting period.
 - (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
 - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
 - (6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.
- (d) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
 - (1) The total operating time of each affected source during the reporting period.
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.

§ 63.5915 What records must I keep?

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

- (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
 - (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - (3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).
- (d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

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

- (a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).
- (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.
- (d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Other Requirements and Information

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

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

§ 63.5930 Who implements and enforces this subpart?

- (a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.
- (b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.
- (c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:
 - (1) Approval of alternatives to the organic HAP emissions standards in §63.5805 under §63.6(g).
 - (2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.
 - (3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.

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

§ 63.5935 What definitions apply to this subpart?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Corrosion-resistant resin means a resin that either:

- (1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH \geq 12.0 or \leq 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or
- (2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low Flame Spread/Low Smoke Products means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTME662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than or equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or

equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

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

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

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

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

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

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

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

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

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

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

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

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

based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

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

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

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

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

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

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

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

Pultrusion means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

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

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

Sheet molding compound (SMC) means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners,

mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

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

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

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

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

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

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

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

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

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

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

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

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

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

major source
threshold prior
to April 21,
2006.

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

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

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

As specified in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

For . . .	That must meet the following standard . . .	You have demonstrated initial compliance if . . .
1. A new or existing closed or molding operation using compression/injection molding.	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.	The owner operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.

2. A new or existing cleaning operation.

Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.

The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

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

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

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

4. An existing or new SMC manufacturing operation.

Close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.

The owner or operator submits a certified statement in the notice of compliance status that the resin delivery system is closed or covered.

5. An existing or new SMC manufacturing operation.

Use a nylon containing film to enclose SMC.

The owner or operator submits a certified statement in the

		notice of compliance status that a nylon-containing film is used to enclose SMC.
6. An existing or new mixing or BMC manufacturing operation.	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.	The owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. An existing mixing or BMC manufacturing operation.	Not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety.	The owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning, except when adding materials or as necessary for safety.
8. A new or existing mixing or BMC manufacturing operation.	Keep the mixer covers closed during mixing except when adding materials to the mixing vessels.	The owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

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

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

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facilities compliance date.

Table 14 to Subpart WWWW of Part 63—Requirements for Reports

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

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

- | | | |
|--|--|---|
| | reporting period. | |
| | b. The information in § 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the information in § 63.5910(e). | Semiannually according to the requirements in § 63.5910(b). |
| | c. The information in § 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan. | Semiannually according to the requirements in § 63.5910(b). |
| 2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan. | a. Actions taken for the event. | By fax or telephone within 2 working days after starting actions inconsistent with the plan. |
| | b. The information in § 63.10(d)(5)(ii). | By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. |

D.1.11 One Time Deadlines Relating to NESHAP WWWW

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- (a) Pursuant to 40 CFR Part 63.9(b)(2) the Permittee must submit an initial notification on or before the close of business on August 19, 2003.

- (b) The Permittee must conduct the performance test, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
- (c) The Permittee must submit a notification of compliance status on or before the close of business on May 21, 2006.

D.1.12 Reinforced Plastics Composites Production [326 IAC 20-56]

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

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) bulk molding compound scale, identified as SC₁, connected to mixers M₅ - M₁₃, constructed prior to 1980, for bulk molding compound production, with a maximum capacity of 900 pounds (100 pounds X 9 lines) per hour, equipped with baghouse B₄ and exhausting to stack S₄.
- (h) Two (2) saws, identified as SA₁ and SA₂, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B₁ and B₂, with no outside exhaust.
- (i) One (1) plastic sander, identified as SN₁ for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B₃, and exhausting to stack S₁.
- (j) One (1) electric oven, identified as O₁, constructed prior to 1980, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S₅.
- (k) One (1) grinder, identified as G₁, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B₇, and exhausting to stack S₆.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(3)]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
Plastic sheet processes (B _{1,2,3})	0.3075	1.86
Bulk molding processes (B ₄)	4 lines X 0.665 = 2.66	7.90
Fiberglass chips processes (B ₇)	0.25	1.62

The pounds per hour PM limitations shall be calculated with the following equation:

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

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

D.2.2 Particulate Matter (PM)

The vacuum/baghouses B₁ and B₂ for PM control shall be in operation at all times the sawing process is in operation. Baghouse B₃ shall be in operation at all times the sander is in operation. Baghouse B₄ shall be in operation at all times the bulk molding compound processes are in operation. Baghouse B₇ shall be in operation at all times the fiberglass chips processes are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Industrial Dielectrics, Inc.
Source Address: 407 South 7th Street, Noblesville, IN 46060
Mailing Address: P.O. Box 357, Noblesville, IN 46061
Part 70 Permit No.: T057-18496-00042

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Industrial Dielectrics, Inc.
Source Address: 407 South 7th Street, Noblesville, IN 46060
Mailing Address: P.O. Box 357, Noblesville, IN 46061
Part 70 Permit No.: T057-18496-00042

This form consists of 2 pages

Page 1 of 2

1. This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

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

Source Name: Industrial Dielectrics, Inc.
Source Address: 407 South 7th Street, Noblesville, IN 46060
Mailing Address: P.O. Box 357, Noblesville, IN 46061
Part 70 Permit No.: T057-18496-00042

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Industrial Dielectrics, Inc.
Source Address: 407 South 7th Street, Noblesville, IN 46060
Mailing Address: P.O. Box 357, Noblesville, IN 46061
Part 70 Permit No.: T057-18496-00042
Facility: 8th and 9th Bulk Molding Compound Lines with Mixers M₁₂ and M₁₃
Parameter: VOC emission
Limit: less than 25 tons per 12 consecutive months period for each Mixer

YEAR: _____ MIXER

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Industrial Dielectrics, Inc.
Source Location: 407 South 7th Street, Noblesville, IN 46060
County: Hamilton
SIC Code: 3087
Operation Permit No.: T057-18496-00042
Permit Reviewer: Roger Osburn

On October 4, 2007, the Office of Air Quality (OAQ) had a notice published in the Noblesville Ledger in Noblesville, Indiana, stating that Industrial Dielectrics, Inc. had applied for a Part 70 Operating Permit renewal for a stationary plastic custom compounding operation. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes.

OAQ Change #1

On November 8, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Hamilton County as attainment for the 8-hour ozone standard. Therefore, the following change will be made to Section A.1 General Information of the permit:

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

The Permittee owns and operates a stationary plastic custom compounding plant that operates fiberglass molding facilities and that produces a bulk molding compound and plastic sheets.

Source Address:	407 South 7th Street, Noblesville, IN 46060
Mailing Address:	P.O. Box 357, Noblesville, IN 46061
General Source Phone Number:	317-773-1766
SIC Code:	3087
County Location:	Hamilton
Source Location Status:	Nonattainment for 8-hour Ozone Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset Rules Minor Source, under PSD Rules and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

OAQ Change #2

Upon further review, the following error was identified in Section D.1.14 and will be corrected as follows:

D.1.12 Reinforced Plastics Composites Production [326 IAC 20-56]

Pursuant to 326 IAC 20-56(b) -2, the Permittee shall comply with the following requirements:

Comments on the proposed Part 70 permit renewal were received on November 2, 2007 from Ms. Catherine Nies, of Cornerstone Environmental, Health and Safety, Inc., representing Industrial Dielectrics, Inc.

Comment #1

Industrial Dielectrics proposes to revise Condition D.1.4(b) to include a flash-off factor of 2% for the bulk molding compound process in lieu of testing to establish an emission factor. In addition, Industrial Dielectrics proposes to remove Condition D.1.8.(a)(6), which references records maintained for the testing results.

Response to Comment #1

The proposed 2% emission factor is from AP-42 Sec. 6.4 (Paint and Varnish Manufacturing) which is a similar process to bulk molding compound manufacturing. Cornerstone Environmental provided data which supports the use of the 2% emission factor. In addition an EPA RPC-NESHAP background document that discusses the methodology for the BMC emission factors using a baseline emission factor of 2% was provided for further documentation. Therefore, references to testing requirements will be removed from the permit in Sections D.1.4(b), D.1.6, and D.1.8(a)(6).

D.1.4 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.2 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 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.

(b) Compliance with Condition D.1.2 shall be determined by the following equation:

$$V * R * 1330\text{lbs/hr} * (8760\text{hr/yr}) * (1\text{ton}/2000\text{ lbs}) * F < 25\text{ tons/year}$$

V = VOC content of Raw Material (lbs/lb of Raw Material)

R = Raw Material % of Total Mixture

F = Flash off factor = ~~0.393%~~ until testing is conducted **2%**

~~After the testing required in D.1.6 has been conducted, F will equal the value determined during testing.~~

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

~~The Permittee shall conduct testing to determine the VOC flash-off factor for the Bulk Molding Compound Mixers (M₅ - M₁₃ and M₁₆ - M₁₉). This testing will be conducted within ninety (90) days after issuance of this permit and in accordance with Condition C.7 and 326 IAC 3-6.~~

D.1.87 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
- (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent, containing VOC, usage for each month;
 - (4) The total input of bulk molding compounds materials for the fiberglass molding processes for each month;
 - (5) The weight of VOCs emitted for each compliance period and
 - ~~(6) The VOC flash-off factor and the test results used to determine the VOC flash-off factor for the Bulk Molding Compound Mixers.~~

Comment #2

Industrial Dielectrics proposes to remove the references to coating materials in Condition D.1.4(a) and D.1.8(a)(1).

Response to Comment #2

Since no coating materials are used at the facility, the permit will be changed to reflect this.

D.1.4 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.2 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.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
- (1) The amount and VOC content of each ~~coating~~ material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

Comment #3

Industrial Dielectrics requests that the requirement in Condition D.1.7(b), to record the pressure drop across the baghouse, be removed because there is no gauge to record pressure drop. If the condition is to be left in the permit, Industrial Dielectrics proposes to change the range of the normal pressure drop to .5 to 5 inches of water. In addition, Industrial Dielectrics requests that the condition specify that the requirement applies only to the Bulk Molding Compound baghouses B4 and B9.

Response to Comment #3

Since recording the pressure drop across the baghouse is an effective means of tracking the proper functionality of a baghouse and to satisfy 40 CFR Part 64, Compliance Assurance Monitoring requirements, a pressure gauge should be installed on baghouses B4 and B9. IDEM, OAQ believes the normal range of the pressure drop across the baghouse of 0.5 to 5 inches that Industrial Dielectrics proposes would not be a sufficient range to record the functionality of the baghouse. Therefore, the condition will stand as written in the permit. However, the following will be added to the permit to include language that states the condition only applies to baghouses B4 and B9.

D.1.6 Monitoring [40 CFR Part 64]

- (b) The Permittee shall record the pressure drop across ~~the~~ baghouses **B4 and B9** at least once per day when the processes are in operation. If the pressure drop is outside the normal range of 3.0 to 6.0 inches of water, or a range established during the latest stack test, then the Permittee must take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside this range is a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment #4

Industrial Dielectrics proposes that one (1) Vazo blender be added to the permitted emission units. Assuming 180 batches of material are run per year or three times the current amount, the resulting emissions are insignificant, under one ton per year of PM and PM10. In addition, Industrial Dielectrics requests that an emission limit be placed on the unit based on the raw material usage.

Response to Comment #4

The requirements of 326 IAC 6-3 and 40 CFR Part 63, Subpart WWWW are not applicable to the Vazo blender based on emissions from 180 batches per year. No emission limit will be placed on the unit, however the following will be added to Section D.1 of the permit:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) mixers, identified as M₁ and M₂, constructed prior to 1980, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S₂. Under 40 CFR 63, Subpart WWWW, this is considered a closed molding reinforced plastic composites operation.
- (b) One (1) sheet molding compound mixer, identified as SMC Mixer M₃, constructed prior to 1980, for sheet molding compound production with maximum throughput of 313 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (d) Nine (9) bulk molding compound mixers, identified as M₅ - M₁₁ (constructed prior to 1980) and M₁₂ - M₁₃ (constructed in 1996), for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B₄, and all exhausting to stack S₄. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (e) Four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, constructed in 2005, for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉, exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (f) **One (1) Vazo blender, installed in October 2005, with a maximum capacity of 180 batches of material per year, with each batch composed of 758 pounds of raw materials. The blender is controlled by Baghouse B7.**

Insignificant Activities

- (a) Two (2) laboratory BMC mixers, identified as M₂₁ and M₂₂, constructed in 2005, with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M₁₆ - M₁₉. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (b) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

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

Comment #5

Industrial Dielectrics requests that the following minor physical changes to the SMC area be incorporated into the permit: Two hoods have been added over the two doctor boxes on SMC Mixer Line M4 and three new hoods have been added to the “thickening” operations of the SMC Mixer Line M4, where the chemicals that go into the doctor box are prepared. This results in no change to the potential emissions, however the emissions are now stack emissions instead of fugitive emissions. All five hoods are ducted together and exhausted outside the building. This request is considered a minor physical change as defined in 326 IAC 2-1.1-1(6).

In addition, Industrial Dielectrics plans to install a cover over the glass chopping section of the SMC Mixer Line to remove glass dust that falls as a result of the chopping function. The new cover will be connected to the existing baghouse B8. This cover would replace an existing unit that is not functioning optimally. This change is also considered a minor physical change as a replacement or addition of air pollution control devices. Again, this minor physical change does not require modification approval if the change does not increase potential emissions from the source.

Response to Comment #5

Pursuant to 326 IAC 2-1.1-3(h)(2), minor physical changes to a source do not require modification approval if the minor physical change does not increase potential emissions from the source. Therefore, the following language will be added to Section A.2 of the permit.

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:

- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour exhausting to stack S₃, controlled by a baghouse B₈. **Five hoods were added in 2007 over the doctor boxes and thickening operations; all five hoods are ducted together and are exhausting to stack S₃, controlled by a baghouse B₈.** Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

Since the cover over the glass chopping area will replace an existing unit and the new unit has not yet been installed, no changes will be made to the permit.

Comment #6

Industrial Dielectrics proposes to remove Conditions D.1.11 and D.1.12 from the permit because they reference the previous version of NESHAP Subpart WWWW.

Response to Comment #6

Section D.1.12 has been removed from the permit. This section included the version of 40 CFR 63, Subpart WWWW that was incorporated into the state rules at 326 IAC 20-56. This rule has since been updated and is the same as 40 CFR 63 Subpart WWWW. All other applicable portions of the rule will remain in the permit. Subsequent conditions have been renumbered without reproduction herein.

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

D.1.12 State Only Reinforced Plastic Composites National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (NESHAP) Requirements [326 IAC 20-56]

Pursuant to 326 IAC 20-56, the Permittee shall comply with the previous version of 40 CFR Part 63, Subpart WWWW, published in 68 FR 19402, April 21, 2003, for the two mixers, identified as M₁ and M₂ (compression/closed molding), one (1) sheet molding compound mixer, identified as SMC Mixers M₃, one (1) sheet molding compound line, identified as SMC Mixer M₄, nine (9) bulk molding compound mixers, identified as M₅–M₁₃, four (4) bulk molding compound (BMC) mixers, identified as M₁₄–M₁₉, two (2) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, two (2) insignificant laboratory BMC mixers, identified as M₂₄ and M₂₅, four (4) bulk molding compound (lab) mixers identified as M₂₃–M₂₆, cleaning of materials used in reinforced plastic composites manufacture and HAP-containing material storage, with a compliance date of April 21, 2006.

Compliance with the requirements specified in Condition D.1.10 shall satisfy the requirements of 326 IAC 20-56, with the exception of the requirements listed under 40 CFR 63.5810, 40 CFR 63.5895(d) and Tables 1, 3 and 7 in that condition. In place of those requirements, to satisfy 326 IAC 20-56 only, the Permittee shall comply with the following:

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

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

For . . .	You must . . .
1. A new or existing closed molding operation using compression/injection molding.	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. A new or existing cleaning operation.	Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. A new or existing	Keep containers that store HAP-containing

- ~~materials HAP containing materials closed or covered except materials storage operation. during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.~~
4. An existing or new SMC manufacturing operation. Close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. An existing or new SMC manufacturing operation. Use a nylon containing film to enclose SMC.
6. An existing or new mixing or BMC manufacturing operation. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. An existing mixing or BMC manufacturing operation. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
8. A new or existing mixing or BMC manufacturing operation \1\. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

~~\1\ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.~~

Table 9 to Subpart WWW of Part 63--Initial Compliance With Work Practice Standards
As required in Sec. 63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

~~You have _____ For . . . _____ That must meet the _____ demonstrated following standard initial compliance if~~

1. A new or existing closed or molding operation using compression/injection molding. Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with _____ The owner operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped or exposed per mold cycle per compression/injection molding machine, or prior

_____ robotic loaders, _____ to the loader,
_____ no more than one _____ hoppers are
_____ charge may be _____ closed except
_____ exposed prior to _____ when adding
_____ the loader. For _____ materials, and
_____ machines fed by _____ materials are
_____ hoppers, _____ recovered after
_____ sufficient _____ slitting.
_____ material may be
_____ uncovered to fill
_____ the hopper.
_____ Hoppers must be
_____ closed when not
_____ adding materials.
_____ Materials may be
_____ uncovered to feed
_____ to slitting
_____ machines.
_____ Materials must be
_____ recovered after
_____ slitting.

2. A new or existing cleaning operation. Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement. The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

3. A new or existing materials HAP-containing materials storage operation. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or

- _____ necessary for _____ removing
_____ safety. _____ materials, and
_____ that any bulk
_____ storage tanks are
_____ vented only as
_____ necessary for
_____ safety.
4. An existing or new SMC _____ Close or cover the _____ The owner or
-manufacturing operation. _____ resin delivery _____ operator submits
_____ system to the _____ a certified
_____ doctor box on each _____ statement in the
_____ SMC manufacturing _____ notice of
_____ machine. The _____ compliance status
_____ doctor box itself _____ that the resin
_____ may be open. _____ delivery system
_____ is closed or
_____ covered.
5. An existing or new SMC _____ Use a nylon _____ The owner or
-manufacturing operation. _____ containing film to _____ operator submits
_____ enclose SMC. _____ a certified
_____ statement in the
_____ notice of
_____ compliance status
_____ that a nylon-
_____ containing film
_____ is used to
_____ enclose SMC.
6. An existing or new mixing or _____ Use mixer covers _____ The owner or
-BMC manufacturing operation. _____ with no visible _____ operator submits
_____ gaps present in _____ a certified
_____ the mixer covers, _____ statement in the
_____ except that gaps _____ notice of
_____ of up to 1 inch _____ compliance status
_____ are permissible _____ that mixer covers
_____ around mixer _____ are closed during
_____ shafts and any _____ mixing except
_____ required _____ when adding
_____ instrumentation. _____ materials to the
_____ mixers, and that
_____ gaps around mixer
_____ shafts and
_____ required
_____ instrumentation
_____ are less than 1
_____ inch.
7. An existing mixing or BMC _____ Not actively vent _____ The owner or
-manufacturing operation. _____ mixers to the _____ operator submits
_____ atmosphere while _____ a certified
_____ the mixing _____ statement in the
_____ agitator is _____ notice of
_____ turning, except _____ compliance status
_____ that venting is _____ that mixers are
_____ allowed during _____ not actively
_____ addition of _____ vented to the
_____ materials, or as _____ atmosphere when
_____ necessary prior to _____ the agitator is
_____ adding materials _____ turning, except

~~_____ for safety. _____ when adding
_____ materials or as
_____ necessary for
_____ safety.
8. A new or existing mixing or Keep the mixer The owner or
BMC manufacturing operation. covers closed operator submits
_____ during mixing a certified
_____ except when adding statement in the
_____ materials to the notice of
_____ mixing vessels. compliance status
_____ that mixers
_____ closed except
_____ when adding
_____ materials to the
_____ mixing vessels.~~

Comment #7

Sheet molding compound mixer M3 was never modified to increase capacity from 313 pounds per hour to 1200 pounds per hour, as stated on page 8(b) of the TSD. Bulk molding compound mixer M20 was removed from the facility, and should no longer be listed on pages 12(d), 13(c) and on page 15 under Testing Requirements of the TSD. The bulk molding compound mixers M14, M15, and M23 through M26 should not be listed under Permitted Emission Units, but only under Insignificant Activities.

Response to Comment #7

IDEM, OAQ prefers the TSD remain the same as the version that was public noticed. Therefore, the TSD will not be changed, but noted in this addendum.

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

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

Source Description and Location

Source Name:	Industrial Dielectrics, Inc.
Source Location:	407 South 7th Street, Noblesville, IN 46060
County:	Hamilton
SIC Code:	3087
Operation Permit No.:	T057-7683-00042
Operation Permit Issuance Date:	November 3, 1999
Permit Renewal No.:	T057-18496-00042
Permit Reviewer:	Roger Osburn

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Industrial Dielectrics, Inc. relating to the operation of a stationary plastic custom compounding plant that operates fiberglass molding facilities and that produces a bulk molding compound and plastic sheets.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) mixers, identified as M₁ and M₂, constructed prior to 1980, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S₂. Under 40 CFR 63, Subpart WWWW, this is considered a closed molding reinforced plastic composites operation.
- (b) One (1) sheet molding compound mixer, identified as SMC Mixer M₃, constructed prior to 1980, for sheet molding compound production with maximum throughput of 313 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (d) Nine (9) bulk molding compound mixers, identified as M₅ - M₁₁ (constructed prior to 1980) and M₁₂ - M₁₃ (constructed in 1996), for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B₄, and all exhausting to stack S₄. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (e) Four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, constructed in 2005, for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉,

exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (f) One (1) bulk molding compound scale, identified as SC₁, connected to mixers M₅ - M₁₃, constructed prior to 1980, for bulk molding compound production, with a maximum capacity of 900 pounds (100 pounds X 9 lines) per hour, equipped with baghouse B₄ and exhausting to stack S₄.
- (g) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (h) Two (2) saws, identified as SA₁ and SA₂, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B₁ and B₂, with no outside exhaust.
- (i) One (1) plastic sander, identified as SN₁ for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B₃, and exhausting to stack S₁.
- (j) One (1) electric oven, identified as O₁, constructed prior to 1980, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S₅.
- (k) One (1) grinder, identified as G₁, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B₇, and exhausting to stack S₆.

Unpermitted Emission Units and Pollution Control Equipment

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

Permitted Emission Units Removed from the Source

The following emission unit has been permanently removed from service:

- (a) One (1) fiberglass pultrusion molding machine, identified as P₁, constructed prior to 1980, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two (2) small workshop-type baghouses, B₅ and B₆, and exhausting to stack S₇. Under 40 CFR 63, Subpart WWWW, this is considered a pultrusion operation.
- (b) One (1) bulk molding compound (BMC) mixer, identified as M₂₀, constructed in 2005, for bulk molding compound production, with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉, exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

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

There are no new emission units or pollution control equipment receiving advanced source modification approval during this review process.

Insignificant Activities

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

- (a) Two (2) laboratory BMC mixers, identified as M₂₁ and M₂₂, constructed in 2005, with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M₁₆ - M₁₉. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (b) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or
 - (2) having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, welding equipment.
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower
- (j) Stationary fire pumps.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (l) Six (6) aboveground polyester resin storage tanks, identified as T₁ - T₅, each with a maximum capacity of 6,200 gallons and T₇, with a maximum capacity of 4,000 gallons each equipped with one vent, V₁ - V₅ and V₇, and each with the potential to emit less than 1 ton VOC/year.
- (m) Two (2) underground styrene storage tank, identified as T₆ and T₈, each with a maximum capacity of 4,000 gallons, equipped with vent V₆, with the potential to emit less than 1 ton styrene/year.
- (n) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Existing Approvals

The source was issued Part 70 Operating Permit No. T057-7689-00042 on November 3, 1999. The source has since received the following approvals:

- (a) First Permit Reopening No. 057-13301-00042, issued on January 28, 2002;
- (b) First Significant Source Modification No. 057-18484-00042, issued on April 30, 2004;
- (c) First Significant Permit Modification No. 057-18815-00042, issued on May 17, 2004;
- (d) First Minor Source Modification No. 057-20904-00042, issued on May 13, 2005;
- (e) First Minor Permit Modification No. 057-20971-00042, issued on July 18, 2005; and
- (f) Second Significant Permit Modification No. 057-21510-00042, issued on January 18, 2006.

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

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

- (a) Brazing equipment, cutting torches, soldering equipment and welding equipment.

The facility indicated that they do not have any brazing equipment at the facility. Brazing equipment has been removed from the permit.

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

The facility indicated that they have one tumbling machine that is not controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators. Since the facility does not have any grinding and machining operations with controls, this condition has been removed from the permit.

Enforcement Issue

- (a) The Bulk Molding Compound Mixers, M₅ – M₁₁ and M₁₆ – M₁₉, using baghouses for particulate emission control, is subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM) because it is a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM.- This unit is not a "large unit" as described in 40 CFR 64.5.

Pursuant to 40 CFR 64.5(b), the Permittee was required to submit a CAM plan as part of the Title V renewal application. The Permittee did not submit a CAM plan with the Title V renewal application submitted on August 27, 2006. A CAM plan was received on August 28, 2007.

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

Recommendation

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

Unless otherwise stated, information used in this review was derived from the previous Part 70 Permit and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on February 4, 2004. Additional information was received on August 27, 2006.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 1 through 14.

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on November 3, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Bulk Molding Compound Mixers, (M ₅ - M ₁₃ and M ₁₆ - M ₂₀)	0.42	0.42	-	35.17	-	-	25.42
Sheet Molding Compound Mixers, (M ₃ and M ₄)	40.91	40.91	-	26.69	-	-	24.13
Fiberglass Sheet Production Mixers, (M ₁ - M ₂)	15.61	15.61	-	11.48	-	-	9.37
Closed Molding for Fiberglass Sheet Production Mixers, (M ₁ - M ₂)	15.61	15.61	-	17.09	-	-	14.06
Total PTE	72.56	72.56	-	90.42	-	-	72.98

- means negligible

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2004 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	0.04
SO ₂	Not Reported
VOC	36.24
CO	Not Reported
NO _x	Not Reported
Total HAP	Not Reported
Styrene	Not Reported
Hexane	Not Reported
Hydroquinone	Not Reported
Vinyl Acetate	Not Reported
Dibutyl Phthalate	Not Reported

County Attainment Status

The source is located in Hamilton County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Hamilton County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Hamilton County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Nonattainment NSR.
- (c) Hamilton County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is still subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The storage tanks T₁ – T₅ and T₇ at this facility are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC12, (40 CFR 60.110b Subpart Kb), due to each tank capacity being less than 40 cubic meters. Therefore, this NSPS is not included in this permit.
- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts (40 CFR 63, Subpart PPPP, which is incorporated by reference as 326 IAC 20-81). This rule applies to sources that own and operate a plastic parts and products surface coating facility that is located at a major source of HAP emissions. This source does not surface coat any plastic parts and products. Therefore, this NESHAP is not included in this permit.
- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56. Pursuant to 40 CFR 63.5785 and 40 CFR 63.5790, the affected source that is subject to the requirements of 40 CFR 63, Subpart WWWW consists of all facilities located at the source engaged in the following operations: open molding operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that

contain styrene to produce plastic composites, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

The source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, (40 CFR 63.5780, Subpart WWWW) include closed molding, bulk molding compound manufacturing, sheet molding compound manufacturing, cleaning of materials used in reinforced plastic composites manufacture and HAP-containing material storage associated with the production of plastic composites. These processes are subject to the rule because the source is a major source of HAPs and the gel coat and resin facilities are used to manufacture reinforced plastics composites.

This source does not have any centrifugal casting or continuous lamination/casting operations. The specific facilities include the following:

- (a) Two (2) mixers, identified as M₁ and M₂, constructed prior to 1980, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S₂. Under 40 CFR 63, Subpart WWWW, this is considered a closed molding reinforced plastic composites operation.
- (b) One (1) sheet molding compound mixer, identified as SMC Mixer M₃, constructed prior to 1980, modified in 2004, for sheet molding compound production with increase in maximum throughput from 313 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (c) One (1) sheet molding compound line, identified as SMC Mixer M₄, constructed prior to 1980, relocated and modified with the Cowles Mixer in 2004, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S₃, controlled by a baghouse B₈. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.
- (d) Nine (9) bulk molding compound mixers, identified as M₅ - M₁₁ (constructed prior to 1980) and M₁₂ - M₁₃ (constructed in 1996), for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B₄, and all exhausting to stack S₄. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.
- (e) Four (4) bulk molding compound (BMC) mixers, identified as M₁₆ - M₁₉, constructed in 2005, for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B₉, exhausting inside the building. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

Insignificant Activities

- (a) Two (2) laboratory BMC mixers, identified as M₂₁ and M₂₂, constructed in 2005, with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M₁₆ - M₁₉. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (b) Six (6) bulk molding compound (lab) mixers, identified as M₁₄ and M₁₅, each with a maximum capacity of 66 pounds per hour and M₂₃ - M₂₆, each with a maximum capacity of 20 pounds per hour, each mixer was constructed prior to 1980, for bulk molding compound production, with no pollution control equipment and exhausting inside the building, with no outside exhaust. Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

Pursuant to 40 CFR 63.5800, the Permittee shall comply with the requirements of 40 CFR 63, Subpart WWWW by April 21, 2006.

Nonapplicable portions of the NESHAP will not be included in the permit. The existing affected source associated with the production of plastic composites is subject to the following portions of 40 CFR 63, Subpart WWWW:

- (1) 40 CFR 63.5800
- (2) 40 CFR 63.5805(a)
- (3) 40 CFR 63.5830(b)
- (4) 40 CFR 63.5835(a) and (c)
- (5) 40 CFR 63.5840
- (6) 40 CFR 63.5860(a)
- (7) 40 CFR 63.5895(b) and (e)
- (8) 40 CFR 63.5900(a)(4), (b), and (e)
- (9) 40 CFR 63.5905
- (10) 40 CFR 63.5910(a), (b), (c), (d), (g) and (h)
- (11) 40 CFR 63.5915(a) and (d)
- (12) 40 CFR 63.5920
- (13) 40 CFR 63.5925
- (14) 40 CFR 63.5930
- (15) 40 CFR 63.5935

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

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to pollutant-specific emission units that meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Sheet Molding Compound Mixers, M ₃ - M ₄ - PM	Baghouse	Y	40.91	0.06	100	N	N
Bulk Molding Compound Mixers, M ₅ - M ₁₁ - PM	Baghouse	Y	245.82	0.25	100	Y	N
Bulk Molding Compound Mixers, M ₁₂ - M ₁₃ - VOC	None	Y	5.87	49.8	100	N	N
Bulk Molding Compound Mixers, M ₁₂ - M ₁₃ - PM	Baghouse	Y	70.24	0.07	100	N	N
Bulk Molding Compound Mixers, M ₁₆ - M ₁₉ - VOC	None	Y	10.95	124.5	100	N	N
Bulk Molding Compound Mixers, M ₁₆ - M ₁₉ - PM	Baghouse	Y	105.88	0.13	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Bulk Molding Compound Mixers, M₅ - M₁₁ and M₁₆ - M₁₉ for PM. Pursuant to 40 CFR 64.5(b), the Permittee is required to submit information required under 40 CFR 64.4 regarding these facilities as part of the Part 70 renewal Application. See the *Compliance Determination and Monitoring Requirements* section of this document for the 40 CFR Part 64 requirements. In addition, the source is not subject to CAM for VOCs and HAPs due to no controls being present to control emissions.

State Rule Applicability Determination

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on March 13, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) this source is a minor source. This source has not gone through Prevention of Significant Deterioration (PSD) review because the facility was constructed prior to 1980 and prior to 326 IAC 2-2 being established. Modifications in 1996, 2004 and 2005 were each below the 250 tons per year potential to emit (PTE) of air criteria pollutant in 326 IAC 2-2. Emissions of PM_{2.5}, VOC and NO_x are regulated by 326 IAC 2-3 (Emission Offset). The source is not one of the 28 listed source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-1.1-5 (Air Quality Requirements)

Hamilton County was declared nonattainment for PM_{2.5} on April 5, 2005. The OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Nonattainment NSR. The facility has not conducted any modifications since these nonattainment classifications were established. Any future modifications to the facility would be required to meet the requirements of Nonattainment NSR.

326 IAC 2-3 (Emission Offset)

Hamilton County was declared nonattainment for 8-hour Ozone on June 15, 2004. Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Since the source has the potential to emit VOC and NO_x greater than one hundred (100) tons per year the source is major under 326 IAC 2-3. The facility has not conducted any modifications since these nonattainment classifications were established. Any future modifications to the facility would be required to meet the requirements of 326 IAC 2-3.

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

The facility emits greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the facility, however, pursuant to 326 IAC 2-4.1-1(b)(2), because the facility is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, the Fiberglass Sheet Production Mixers, Sheet Molding Compound Mixers, Bulk Molding Compound Mixers, Pultrusion Molding Machine and Bulk Molding Compound Lab Mixers are exempt from the requirements of 326 IAC 2-4.1. All other emission units not specifically regulated by 40 CFR 63, Subpart WWWW, are subject to 326 IAC 2-4.1

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source is not subject to the annual reporting of 326 IAC 2-6-3(a)(1) since the annual potential to emit is less than emission thresholds; it is however subject to 326 IAC 2-6-3(a)(2). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report was due no later than July 1, 2005, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the sanded plastic sheet processes, bulk molding compound processes, fiberglass pultrusion molding machines, and fiberglass chips processes 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:

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

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
Plastic sheet processes (B _{1,2,3})	0.3075	1.86
Bulk molding processes (B ₄)	4 lines X 0.665 = 2.66	7.90
Fiberglass chips processes (B ₇)	0.25	1.62
Mixing Line M ₃	0.16	1.18
Mixing Line M ₄	0.60	2.9
Mixing Line M ₁₆	0.50	2.58
Mixing Line M ₁₇	0.50	2.58
Mixing Line M ₁₈	0.50	2.58
Mixing Line M ₁₉	0.50	2.58

- (b) The vacuum/baghouses B₁ and B₂ for PM control shall be in operation at all times the sawing process is in operation. Baghouse B₃ shall be in operation at all times the sander is in operation. Baghouse B₄ shall be in operation at all times the bulk molding compound processes are in operation. Baghouse B₇ shall be in operation at all times the fiberglass chips processes are in operation.
- (c) The baghouse B₈ shall be in operation at all times when any of the sheet molding compound line mixer, identified as SMC Mixers M₃ and M₄ is in operation, in order to comply with the PM limits under 326 IAC 6-3-2.
- (d) The Baghouse B₉ shall be in operation at all times when any of the Bulk Molding Compound Mixing Line, identified as M₁₆ – M₂₀ is in operation in order to comply with the PM limits under 326 IAC 6-3-2.
- (e) Welding equipment at the facility is exempt from 326 IAC 6-3-2 as per 326 IAC 6-3-1(b)(9) since less than six hundred twenty-five (625) pounds of rod or wire are consumed per day.
- (f) Cutting torches at the facility are exempt from 326 IAC 6-3-2 as per 326 IAC 6-3-1(b)(10) since less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

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

This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state which are not otherwise regulated by other provisions in this article 326 IAC 8.

Emission Unit	Potential to Emit Volatile Organic Compounds (tons/yr)	Date of Construction
Fiberglass Sheet Production Mixer - M ₁	14.29	Prior to 1980
Fiberglass Sheet Production Mixer - M ₂	14.29	Prior to 1980
Sheet Molding Compound Mixer - M ₃	21.17	Prior to 1980
Sheet Molding Compound Mixer - M ₄	21.17	Prior to 1980
Bulk Molding Compound Mixer - M ₅	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₆	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₇	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₈	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₉	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₁₀	2.93	Prior to 1980
Bulk Molding Compound Mixer - M ₁₁	2.93	Prior to 1980
Bulk Molding Compound Mixers - M ₁₂	Limited < 25	1996
Bulk Molding Compound Mixers - M ₁₃	Limited < 25	1996
Bulk Molding Compound Lab Mixer - M ₁₄	0.15	Prior to 1980
Bulk Molding Compound Lab Mixer - M ₁₅	0.15	Prior to 1980
Bulk Molding Compound Mixer - M ₁₆	PTE < 25	2005
Bulk Molding Compound Mixer - M ₁₇	PTE < 25	2005
Bulk Molding Compound Mixer - M ₁₈	PTE < 25	2005
Bulk Molding Compound Mixer - M ₁₉	PTE < 25	2005
Bulk Molding Compound Scale - SC ₁	PTE < 25	Prior to 1980
Electric Oven - O ₁	PTE < 25	Prior to 1980

(a) Mixers M₁, M₂, M₃, M₄, M₁₄, M₁₅, scale SC₁, oven O₁, and seven bulk molding compound lines with mixers M₅ - M₁₁ were constructed prior to Jan 1, 1980, so 326 IAC 8-1-6 does not apply to those units.

(b) Pursuant to Part 70 Permit No. 057-7683-00042, bulk molding compound lines with mixers M₁₂ and M₁₃, constructed in 1996, and each have PTE VOC greater than 25 tons per year. Therefore, VOC emissions from M₁₂ and M₁₃ shall be limited to less than 25 tons per 12 consecutive month period, each, as determined by the following equation:

$$V * R * 1330\text{lbs/hr} * (8760\text{hr/yr}) * (1\text{ton}/2000\text{ lbs}) * \text{flash off factor} (0.393\%) < 25\text{ tons/year}$$

V = VOC content of Raw Material (lbs/lb of Raw Material)

R = Raw Material % of Total Mixture

F = Flash off factor = 0.393% until testing is conducted

After the testing required in D.1.6 has been conducted, F will equal the value determined during testing.

Based on a maximum production of 1330 lbs/hr and a flash off factor of 0.393%, VOC emissions from the 8th and 9th bulk molding compound lines will be limited to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable.

(c) The Bulk Molding Compound Mixing Lines M₁₆ through M₂₀, are not subject to 326 IAC 8-1-6, as each mixing line has potential VOC emissions less than 25 tons per year.

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

- (a) 40 CFR 63.5830(b).

There are also changes in Tables 3, 4, 8 and 9 that change the requirements of the rule for this source. When the revised rule is incorporated into the SIP, the Permittee may apply for a revision to the permit to remove any requirements from the previous version of the rule that are not present in the updated version of the rule. See the *Federal Rule Applicability* section of this document for information regarding 40 CFR Part 63, Subpart WWWW.

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

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

Testing Requirements

During the review process of the Title V permit renewal the Permittee has requested that a Flash-off % of 0.393%, instead of the previous 3%, be used for the Bulk Molding Compound Mixers, M₅ - M₁₃ and M₁₆ - M₂₀. This new emission factor is used in all emission calculations in this Title V permit renewal on the condition that sampling be conducted to verify this value. In 2005 IDEM, OAQ allowed the Permittee to use this flash-off factor in the First Minor Permit Modification number 057-20971-00042 and First Minor Source Modification number 057-20904-00042 for Bulk Molding Compound Mixers, M₁₆ - M₂₀. Pursuant to 326 IAC 2-1.1-11, IDEM, OAQ is requiring the facility to conduct a one time mass balance test to verify this emission factor for Bulk Molding Compound Mixers, M₅ - M₁₃ and M₁₆ - M₂₀. The required testing will be conducted within ninety (90) days of issuance of this permit and will be conducted in accordance with 326 IAC 3-6.

Compliance Determination and Monitoring Requirements

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

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

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

Visible Emissions Notations

- (a) Daily visible emission notations of the Bulk Molding Compound Mixers, M₅ - M₁₁ and M₁₆ - M₁₉ for PM stack exhausts, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Parametric Monitoring of Baghouse Operational Parameters

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Bulk Molding Compound Mixers, $M_5 - M_{11}$ and $M_{16} - M_{19}$, at least once per day when the processes are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

Broken or Failed Bag Detection

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

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

These monitoring conditions are necessary because the baghouse for the Bulk Molding Compound Mixers, $M_5 - M_{11}$ and $M_{16} - M_{19}$, must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 40 CFR Part 64 (CAM) and 326 IAC 2-7 (Part 70)

Recommendation

The operation of this stationary plastic and plastic resin production plant that operates fiberglass molding, and lamination facilities and that produces a bulk molding compound, plastic sheets, and plastic component parts shall be subject to the conditions of the attached Part 70 Permit Renewal No. T057-18496-00042.

Appendix A: Emission Calculations VOC and Particulate From Fiberglass Sheet Production Mixers M₁ - M₂

Company Name: Industrial Dielectrics, Inc.
Address: 407 South 7th Street, Noblesville, IN 46060
Permit: T057-18496-00042

Reviewer: Roger Osburn
Date: October 2006

Mixer Production Rate (lb/hr) 313
Number of Mixers 2
Potential VOC Emissions (tons/year) 11.48
Controlled Potential PM Emissions (tons/year) 15.61

Based on Actual Usage 11/21/03 to 11/22/04

Raw Material	Density (lb/gal)	Weight % Organics	Actual Annual Usage	Percent of Total Mixture	Maximum Hourly Throughput (lbs/hr)	Flash-off %	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Actual VOC tons per year	Particulate Emissions Handling EF %	Baghouse Control Efficiency %	Uncontrolled Potential Particulate Emissions (tons/year)	Controlled Potential Particulate Emissions (tons/year)
Filler		0.00%	469006	56.9%	356	2.0%	0.00	0.00	0.00	0.00	1.0%	0.0%	15.61	15.61
Styrene		99.80%	58112	7.1%	44	2.0%	0.88	21.16	3.86	0.58				
Fiberglass		0.00%	0	0.0%	0	2.0%	0.00	0.00	0.00	0.00				
Cleaner		99.00%	80	0.0%	0	100%	0.06	1.44	0.26	0.04				
Aropol 7721 (Resin)	9.4	37.00%	5,533	0.7%	4	2.0%	0.03	0.75	0.14	0.02				
Hetron-FR1540 (Resin)	12.1	28.00%	1,794	0.2%	1	2.0%	0.01	0.18	0.03	0.01				
Hetron-92 (Resin)	11.21218	30.00%	25,853	3.1%	20	2.0%	0.12	2.83	0.52	0.08				
Laminac-4128-NP (Resin) **		67.00%	2,262	0.3%	2	2.0%	0.02	0.55	0.10	0.02				
MR14027 (Resin)	9.163	33.00%	203,943	24.8%	155	2.0%	1.02	24.55	4.48	0.67				
MR14029 (Resin)	9.0131	40.00%	21,090	2.6%	16	2.0%	0.13	3.08	0.56	0.08				
PED 555-85-VT-N (Resin) **		67.00%	28,303	3.4%	22	2.0%	0.29	6.92	1.26	0.19				
Luperox A 75 (Catalyst)	5.507	0.00%	2,845	0.3%	2	2.0%	0.00	0.00	0.00	0.00				
Luperox P (Catalyst)	8.6799	100.00%	3,094	0.4%	2	2.0%	0.05	1.13	0.21	0.03				
Luperox 256 (Catalyst)	7.9135	0.00%	655	0.1%	0	2.0%	0.00	0.00	0.00	0.00				
Modifier H	8.72984	75.00%	1,140	0.1%	1	2.0%	0.01	0.31	0.06	0.01				

TOTALS **100%** **626** **11.5** **1.7** **15.61** **15.61**

METHODOLOGY

Maximum Hourly Throughput (lb/hr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture
 Potential VOC pounds per hour = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off %
 Potential VOC pounds per day = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (24 hr/day)
 Potential VOC pounds per year = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (8760 hr/day) * (1 ton/2000 lbs)
 Estimated Actual VOC (tons/yr) = Weight % Volatile Organics * Actual Annual Usage (lbs/yr) * Flash-off % * (1 ton/2000 lbs)
 Uncontrolled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs)
 Controlled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs) * (1 - Baghouse Control Efficiency %)

NOTES

** VOC content estimated based on similar products.

Appendix A: Emission Calculations VOC and Particulate From Closed Molding for Fiberglass Sheet Production Mixers M₁ - M₂

Company Name: Industrial Dielectrics, Inc.
Address: 407 South 7th Street, Noblesville, IN 46060
Permit: T057-18496-00042

Reviewer: Roger Osburn
Date: October 2006

Mixer Production Rate (lb/hr) **313**
Number of Mixers **2**
Potential VOC Emissions (tons/year) **17.09**
Controlled Potential PM Emissions (tons/year) **15.61**

Based on Actual Usage 11/21/03 to 11/22/04

Raw Material	Density (lb/gal)	Weight % Organics	Actual Annual Usage	Percent of Total Mixture	Maximum Hourly Throughput (lbs/hr)	Flash-off %	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Actual VOC tons per year	Particulate Emissions Handling EF %	Baghouse Control Efficiency %	Uncontrolled Potential Particulate Emissions (tons/year)	Controlled Potential Particulate Emissions (tons/year)
Filler		0.00%	469006	56.9%	356	3%	0.00	0.00	0.00	0.00	1.0%	99.9%	15.61	0.02
Styrene		99.80%	58112	7.1%	44	3%	1.32	31.73	5.79	0.87				
Fiberglass		0.00%	0	0.0%	0	3%	0.00	0.00	0.00	0.00				
Cleaner		99.00%	80	0.0%	0	100%	0.06	1.44	0.26	0.04				
Aropol 7721 (Resin)	9.4	37.00%	5,533	0.7%	4	3%	0.05	1.12	0.20	0.03				
Hetron-FR1540 (Resin)	12.1	28.00%	1,794	0.2%	1	3%	0.01	0.27	0.05	0.01				
Hetron-92 (Resin)	11.21218	30.00%	25,853	3.1%	20	3%	0.18	4.24	0.77	0.12				
Laminac-4128-NP (Resin) **		67.00%	2,262	0.3%	2	3%	0.03	0.83	0.15	0.02				
MR14027 (Resin)	9.163	33.00%	203,943	24.8%	155	3%	1.53	36.83	6.72	1.01				
MR14029 (Resin)	9.0131	40.00%	21,090	2.6%	16	3%	0.19	4.62	0.84	0.13				
PED 555-85-VT-N (Resin) **		67.00%	28,303	3.4%	22	3%	0.43	10.38	1.89	0.28				
Luperox A 75 (Catalyst)	5.507	0.00%	2,845	0.3%	2	3%	0.00	0.00	0.00	0.00				
Luperox P (Catalyst)	8.6799	100.00%	3,094	0.4%	2	3%	0.07	1.69	0.31	0.05				
Luperox 256 (Catalyst)	7.9135	0.00%	655	0.1%	0	3%	0.00	0.00	0.00	0.00				
Modifier H	8.72984	75.00%	1,140	0.1%	1	3%	0.02	0.47	0.09	0.01				
TOTALS				100%	626				17.09	2.57			15.61	0.02

METHODOLOGY

Maximum Hourly Throughput (lb/hr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture
 Potential VOC pounds per hour = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off %
 Potential VOC pounds per day = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (24 hr/day)
 Potential VOC pounds per year = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (8760 hr/day) * (1 ton/2000 lbs)
 Estimated Actual VOC (tons/yr) = Weight % Volatile Organics * Actual Annual Usage (lbs/yr) * Flash-off % * (1 ton/2000 lbs)
 Uncontrolled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs)
 Controlled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs) * (1 - Baghouse Control Efficiency %)

NOTES

** VOC content estimated based on similar products

**Appendix A: Emission Calculations
VOC and Particulate
From Sheet Molding Compound Mixer M₅**

Company Name: Industrial Dielectrics, Inc.
Address: 407 South 7th Street, Noblesville, IN 46060
Permit: T057-18496-00042

Reviewer: Roger Osburn
Date: October 2006

Mixer Production Rate (lb/hr) 313
Number of Mixers 1
Potential VOC Emissions (tons/year) 5.52
Uncontrolled Potential PM Emissions (tons/year) 8.46

Based on Actual Usage 11/21/03 to 11/22/04

Raw Material	Density (lb/gal)	Weight % Volatile Organics	Actual Annual Usage	Percent of Total Mixture	Maximum Hourly Throughput (lbs/hr)	Flash-off %	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Actual VOC tons per year	Particulate Emissions Handling EF %	Baghouse Control Efficiency %	Uncontrolled Potential Particulate Emissions (tons/year)	Controlled Potential Particulate Emissions (tons/year)
Fillers		0.00%	543766	61.7%	193	2.00%	0.00	0.00	0.00	0.00	1.00%	99.7%	8.46	0.03
Styrene		99.80%	60353	6.9%	21	2.00%	0.43	10.27	1.88	0.60				
Fiberglass		0.00%	0	0.0%	0	2.00%	0.00	0.00	0.00	0.00				
Inhibitors		0.00%	596	0.1%	0	2.00%	0.00	0.00	0.00	0.00				
Cleaner		99.00%	88	0.0%	0	100%	0.03	0.74	0.14	0.04				
Arotec 2000 (Resin)	9.31294	38.00%	1962	0.2%	1	2.00%	0.01	0.13	0.02	0.01				
Arotec 2002 (Resin)	9.06304	45.80%	518	0.1%	0	2.00%	0.00	0.04	0.01	0.00				
Dow 790 (Resin) **		67.00%	272	0.0%	0	2.67%	0.00	0.04	0.01	0.00				
Epoxalloy 2110 (Resin) **		67.00%	477	0.1%	0	2.00%	0.00	0.05	0.01	0.00				
FR 610 (Resin)	11.912	24.00%	1080	0.1%	0	2.00%	0.00	0.04	0.01	0.00				
Hetron-FR1540 (Resin)	12.1	28.00%	258	0.0%	0	2.67%	0.00	0.02	0.00	0.00				
Hetron-92 (Resin)	11.21218	30.00%	9781	1.1%	3	2.00%	0.02	0.50	0.09	0.03				
LP-4016 (Resin)	8.2467	61.00%	3858	0.4%	1	2.00%	0.02	0.40	0.07	0.02				
MR13006 (Resin)	9.6	39.00%	29762	3.4%	11	2.00%	0.08	1.98	0.36	0.12				
MR13031 (Resin)	9.25	39.50%	10234	1.2%	4	2.00%	0.03	0.69	0.13	0.04				
MR14027 (Resin)	9.163	33.00%	21775	2.5%	8	2.00%	0.05	1.23	0.22	0.07				
MR14029 (Resin)	9.0131	40.00%	184090	20.9%	65	2.00%	0.52	12.56	2.29	0.74				
MR9600 (Resin)	9.163	37.00%	95	0.0%	0	2.67%	0.00	0.01	0.00	0.00				
N-400 (Resin)		67.00%	18	0.0%	0	2.67%	0.00	0.00	0.00	0.00				
Uralloy LP 2020 (Resin) **		67.00%	4075	0.5%	1	2.00%	0.02	0.47	0.09	0.03				
Luperox P (Catalyst)	8.6799	100.00%	5100	0.6%	2	2.00%	0.04	0.87	0.16	0.05				
Luperox TBICM75 (Catalyst)	7.21378	100.00%	104	0.0%	0	2.67%	0.00	0.02	0.00	0.00				
Luperox 256 (Catalyst)	7.9135	0.00%	888	0.1%	0	2.00%	0.00	0.00	0.00	0.00				
Luperox 26M50 (Catalyst)	6.8306	0.00%	230	0.0%	0	2.67%	0.00	0.00	0.00	0.00				
Luperox 531 M80 (Catalyst)	7.481173	100.00%	888	0.1%	0	2.00%	0.01	0.15	0.03	0.01				
29B75 (Catalyst)	ND	0.00%	184	0.0%	0	2.67%	0.00	0.00	0.00	0.00				
Modifier H	8.72984	75.00%	231	0.0%	0	2.00%	0.00	0.03	0.01	0.00				
TOTALS				100%	313				5.52	1.77			8.46	0.03

METHODOLOGY

Maximum Hourly Throughput (lb/hr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture

Potential VOC pounds per hour = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off %

Potential VOC pounds per day = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (24 hr/day)

Potential VOC pounds per year = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (8760 hr/year)

Estimated Actual VOC (tons/yr) = Weight % Volatile Organics * Actual Annual Usage (lbs/yr) * Flash-off % * (1 ton/2000 lbs)

Uncontrolled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs)

Controlled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs) * (1 - Baghouse Control Efficiency %)

NOTES

** VOC content estimated based on similar products.

**Appendix A: Emission Calculations
HAP
From Sheet Molding Compound Mixer M₄**

Company Name: Industrial Dielectrics, Inc.
Address: 407 South 7th Street, Noblesville, IN 46060
Permit: T057-18496-00042

Reviewer: Roger Osburn
Date: October 2006

Mixer Production Rate (lb/hr) 1,200
Number of Mixers 1
Potential Individual HAP Emissions (tons/year) 19.13
Potential Combined HAP Emissions (tons/year) 19.14

Based on Actual Usage 11/21/03 to 11/22/04										Hazardous Air Pollutant					HAP Potential Emissions					HAP Actual Emissions				
Raw Material	Density (lb/gal)	Weight % Volatile Organics	Actual Annual Usage	Percent of Total Mixture	Maximum Hourly Throughput (lbs/hr)	Maximum Annual Throughput (lbs/hr)	Flash-off %	Weight % Styrene	Weight % Hexane	Weight % Hydroquinone	Weight % Vinyl Acetate	Weight % Dibutyl Phthalate	Styrene (tons/yr)	Hexane (tons/yr)	Hydro-quinone (tons/yr)	Vinyl Acetate (tons/yr)	Dibutyl Phthalate (tons/yr)	Styrene (tons/yr)	Hexane (tons/yr)	Hydro-quinone (tons/yr)	Vinyl Acetate (tons/yr)	Dibutyl Phthalate (tons/yr)		
Fillers		0.00%	2175064	61.7%	741	6,490,354	2.00%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Styrene		99.80%	241413	6.9%	62	720,372	2.00%	99.80%					7.19	0.00	0.00	0.00	0.00	2.41	0.00	0.00	0.00	0.00	0.00	
Fiberglass		0.00%	0	0.0%	0	0	2.00%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Inhibitors		0.00%	2385	0.1%	1	7,116	2.00%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Cleaner		99.00%	352	0.0%	0	1,050	100%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Arotec 2000 (Resin)	9.31294	38.00%	7848	0.2%	3	23,418	2.00%	35.78%					0.08	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	
Arotec 2002 (Resin)	9.06304	45.80%	2073	0.1%	1	6,185	2.00%	40.76%					0.03	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	
Dow 790 (Resin) **		67.00%	1088	0.0%	0	3,247	2.67%	67.00%					0.03	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	
Epoxalloy 2110 (Resin) **		67.00%	1910	0.1%	1	5,898	2.00%	67.00%					0.04	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	
FR 610 (Resin)	11.912	24.00%	4321	0.1%	1	12,893	2.00%	21.90%					0.03	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	
Hetron-FR1540 (Resin)	12.1	28.00%	1031	0.0%	0	3,077	2.67%	25.41%					0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Hetron-92 (Resin)	11.21218	30.00%	39126	1.1%	13	116,750	2.00%	27.94%					0.33	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00	0.00	
LP-4016 (Resin)	8.2467	61.00%	15433	0.4%	5	46,051	2.00%	60.00%		0.80%			0.28	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.00	
MR13006 (Resin)	9.6	39.00%	119050	3.4%	41	355,242	2.00%	36.97%					1.31	0.00	0.00	0.00	0.00	0.44	0.00	0.00	0.00	0.00	0.00	
MR13031 (Resin)	9.25	39.50%	40934	1.2%	14	122,148	2.00%	38.37%					0.47	0.00	0.00	0.00	0.00	0.16	0.00	0.00	0.00	0.00	0.00	
MR14027 (Resin)	9.163	33.00%	87099	2.5%	30	259,903	2.00%	30.48%					0.79	0.00	0.00	0.00	0.00	0.27	0.00	0.00	0.00	0.00	0.00	
MR14029 (Resin)	9.0131	40.00%	736361	20.9%	251	2,197,288	2.00%	37.39%					8.22	0.00	0.00	0.00	0.00	2.75	0.00	0.00	0.00	0.00	0.00	
MR9600 (Resin)	9.163	37.00%	382	0.0%	0	1,139	2.67%	35.00%					0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
N-400 (Resin)		67.00%	70	0.0%	0	210	2.67%	67.00%					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Uralloy LP 2020 (Resin) **		67.00%	16302	0.5%	6	48,644	2.00%	67.00%					0.33	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00	0.00	
Luperox P (Catalyst)	8.6799	100.00%	20400	0.6%	7	60,873	2.00%	0.00%					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Luperox TBICM75 (Catalyst)	7.21378	100.00%	414	0.0%	0	1,237	2.67%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Luperox 256 (Catalyst)	7.9135	0.00%	3554	0.1%	1	10,604	2.00%		1.00%				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Luperox 26M50 (Catalyst)	6.8306	0.00%	919	0.0%	0	2,743	2.67%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Luperox 531 M80 (Catalyst)	7.481173	100.00%	3553	0.1%	1	10,601	2.00%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
29B75 (Catalyst)	ND	0.00%	737	0.0%	0	2,199	2.67%						0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	
Modifier H	8.72984	75.00%	926	0.0%	0	2,762	2.00%						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
TOTALS				100%	1,200								19.13	0.00	0.00	0.00	0.01	6.41	0.00	0.00	0.00	0.00	0.00	
Combined HAP Emissions													19.14					6.42						

METHODOLOGY
 Maximum Annual Throughput (lbs/yr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture * (8760 hr/yr)
 HAP Potential Emissions (tons/yr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture * Flash-off % * Hazardous Air Pollutant Weight % * (8760 hr/yr) * (1 ton/2000 lbs)
 HAP Actual Emissions (tons/yr) = Actual Annual Usage (lbs/yr) * Flash-off % * Hazardous Air Pollutant Weight % * (1 ton/2000 lbs)
 Other Methodology is the same as Page 5 of 14 TSD App A

NOTES
 ** VOC content estimated based on similar products.

Appendix A: Emission Calculations VOC and Particulate From Bulk Molding Compound Mixers M₁₆ - M₁₉

Company Name: Industrial Dielectrics, Inc.
Address: 407 South 7th Street, Noblesville, IN 46060
Permit: T057-18496-00042

Reviewer: Roger Osburn
Date: October 2006

Mixer Production Rate (lb/hr) 1,000
Number of Mixers 4
Potential VOC Emissions (tons/year) 8.76
Controlled Potential PM Emissions (tons/year) 0.11

Based on Actual Usage 11/21/03 to 11/22/04

Raw Material	Density (lb/gal)	Weight % Volatile Organics	Estimated Actual Yearly Usage *(see note) (lbs/yr)	Percent of Total Mixture	Maximum Hourly Throughput (lbs/hr)	Flash-off % ** (see note)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Estimated Actual VOC tons per year	Particulate Emissions Handling EF %	Baghouse Control Efficiency %	Uncontrolled Potential Particulate Emissions (tons/year)	Controlled Potential Particulate Emissions (tons/year)
Fillers		0.00%	1811444	60.4%	2,417	0.393%	0.00	0.00	0.00	0.00	1.0%	99.9%	105.88	0.11
Styrene		99.80%	64742	2.2%	86	0.393%	0.34	8.12	1.48	0.13				
Fiberglass		0.00%	515985	17.2%	689	0.393%	0.00	0.00	0.00	0.00				
Inhibitors		0.00%	2478	0.1%	3	0.393%	0.00	0.00	0.00	0.00				
Cleaner		99.00%	300	0.0%	0	100%	0.40	9.51	1.74	0.15				
HYCAR 1300 X40 (Resin)	7.87185	50.00%	1,683	0.1%	2	0.393%	0.00	0.11	0.02	0.00				
LP-4016 (Resin)	8.2467	61.00%	12,102	0.4%	16	0.393%	0.04	0.93	0.17	0.01				
MR14027 (Resin)	9.163	33.00%	194,578	6.5%	260	0.393%	0.34	8.07	1.47	0.13				
MR14029 (Resin)	9.0131	40.00%	355,938	11.9%	475	0.393%	0.75	17.90	3.27	0.28				
MR9600 (Resin)	9.163	37.00%	8,484	0.3%	11	0.393%	0.02	0.39	0.07	0.01				
N-400 (Resin)		67.00%	11,972	0.4%	16	0.393%	0.04	1.01	0.18	0.02				
Luperox P (Catalyst)	8.6799	100.00%	14,057	0.5%	19	0.393%	0.07	1.77	0.32	0.03				
Luperox 256 (Catalyst)	7.9135	0.00%	1,768	0.1%	2	0.393%	0.00	0.00	0.00	0.00				
Modifier H	8.72984	75.00%	1,850	0.1%	2	0.393%	0.01	0.17	0.03	0.00				
TOTALS			2,997,380	100%	4000				8.76	0.75			105.88	0.11

METHODOLOGY

Maximum Hourly Throughput (lb/hr) = Mixer Production Rate (lb/hr) * Number of Mixers * Percent of Total Mixture
 Potential VOC pounds per hour = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off %
 Potential VOC pounds per day = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (24 hr/day)
 Potential VOC pounds per year = Weight % Volatile Organics * Maximum Hourly Throughput (lbs/hr) * Flash-off % * (8760 hr/day) * (1 ton/2000 lbs)
 Estimated Actual VOC (tons/yr) = Weight % Volatile Organics * Estimated Actual Yearly Usage (lbs/yr) * Flash-off % * (1 ton/2000 lbs)
 Uncontrolled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs)
 Controlled Potential PM Emission (tons/year) = Maximum Hourly Throughput (lbs/hr) * PM Emission Handling EF% * (8760 hr/yr) * (1 ton/2000 lbs) * (1 - Baghouse Control Efficiency %)

NOTES

* Actual material usage for the new BMC mixers is estimated to be 25% of the current throughput of the existing BMC mixers, based on actual raw materials used from 11/03 to 11/04.
 ** For the BMC Manufacturing/Mixing, the process is considered to be covered 95% of the time (emission factor equal to 0.25% of the available HAP) and is considered to be an open process with active ventilation of the mixing vessel 5% of the time (emission factor equal to 3.1% of the available HAP.) The emission factor is (95% x 0.25%) + (5% x 3.1%) = 0.3925%.

**Appendix A: Emission Calculations
Potential to Emit**

Company Name: Industrial Dielectrics, Inc.

Address: 407 South 7th Street, Noblesville, IN 46060

Permit: T057-18496-00042

Reviewer: Roger Osburn

Date: October 2006

	VOC Tons/Yr	PM/PM10 Tons/Yr	Individual HAP Tons/Yr	Combined Hap Tons/Yr	<i>Emission Factors</i>
Bulk Molding Compound Mixers, (M ₅ - M ₁₃ and M ₁₆ - M ₁₉)	35.17	421.94	25.41	25.42	0.3925%
Sheet Molding Compound Mixer, (M ₃)	5.52	8.46	4.99	4.99	2.00%
Fiberglass Sheet Production Mixers, (M ₁ - M ₂)	11.48	15.61	9.37	9.37	2.00%
Closed Molding for Fiberglass Sheet Production Mixers, (M ₁ - M ₂)	17.09	15.61	14.06	14.06	3.00%
Sheet Molding Compound Mixer, (M ₄)	21.17	32.45	19.13	19.14	2.00%
Source Total Emissions - Tons	90.42	494.08	72.95	72.98	

**Appendix A: Emission Calculations
Annual Emissions After Controls**

Company Name: Industrial Dielectrics, Inc.

Address: 407 South 7th Street, Noblesville, IN 46060

Permit: T057-18496-00042

Reviewer: Roger Osburn

Date: October 2006

Based on Actual Usage 11/21/03 to 11/22/04

	VOC Tons/Yr	PM/PM10 Tons/Yr	Individual HAP Tons/Yr	Combined Hap Tons/Yr	<i>Emission Factors</i>
Bulk Molding Compound Mixers, (M₅ - M₁₃ and M₁₆ - M₁₉)	3.78	0.42	2.73	2.73	0.3925%
Sheet Molding Compound Mixer, (M₃)	1.77	0.03	1.60	1.60	2.00%
Fiberglass Sheet Production Mixers, (M₁ - M₂)	1.72	15.61	1.41	1.41	2.00%
Closed Molding for Fiberglass Sheet Production Mixers, (M₁ - M₂)	2.57	0.02	2.11	2.11	3.00%
Sheet Molding Compound Mixer, (M₄)	7.09	0.10	6.41	6.42	2.00%
Source Total Emissions - Tons	16.93	16.17	14.26	14.27	