



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 27, 2004

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

TO: Interested Parties / Applicant
RE: Masterfab, Inc. / 039-18846-00001
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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May 27, 2004

Mr. Christy Miller
Masterfab, Inc.
P. O. Box 463
Goshen, Indiana 46526

Re: 039-18846
Second Administrative Amendment to
Part 70 T039-7117-00001

Dear Mr. Miller:

Masterfab, Inc. was issued a Part 70 permit T039-7117-00001 on May 11, 2000 for operation of fiberglass parts manufacturing plant. A letter requesting a change in the permit was received on April 12, 2004. The source requested to change the Composite Fabricators Association April 7, 1999 unified emission factors for open molding of composites reference to Composite Fabricators Association July 23, 2001 unified emission factors for open molding of composites in Section D.1.1 (a) (2).

The requested change will not result in emissions increase, nor result in new applicable requirements. Moreover, the Best Available Control Technology (BACT) determined for the source is not affected by the change either. Hence, pursuant to 326 IAC 2-7-11 the requested change qualifies for "revisions in descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Therefore, Section D.1.1 (a) (2) is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

- (1) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: CFA Unified Emissions Factors for Open Molding of Composites ~~April 7, 1999~~ **July 23, 2001**, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the attached revised permit page to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gaurav Shil, at (973) 575-2555, ext. 3259 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
GS/EVP

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Masterfab Inc.
16618 Maple City Drive
Goshen, IN 46526**

(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.: T039-7117-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 11, 2000 Expiration Date: May 11, 2005

First Reopening: R 039-13258-00001 Issuance Date: January 29, 2002
First Administrative Amendment: 039-15645-00001 Issuance Date: April 1, 2002

Second Administrative Amendment: 039-18846	Pages Amended: 28
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 27, 2004



SECTION A.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (1) One (1) gelcoat booth, with a maximum capacity of 110 pounds per hour of gelcoat, using dry filters as control, and exhausting to stack 1.2(a) through 1.2(c) .
- (2) One (1) lamination booth, with a maximum capacity of 414 pounds per hour of resin, using dry filters as control, and exhausting to stack 1.3(a) through 1.3(e) .
- (3) One (1) grinding area, with a maximum capacity of 1104 pounds per hour, using bag filters for particulate control, and exhausting to stack 1.4(a) through stack 1.4(h).
- (4) Mold and pattern shop area, with a maximum capacity of resin 2.07 pounds per hour, and maximum capacity of gelcoat 0.67 pounds per hour using dry filters for particulate control, and exhausting to stack 1.5.
- (5) Final finish & specialty products area, with a maximum capacity of resin 0.32 pounds per hour, and maximum capacity of gelcoat 0.91 pounds per hour using dry filters for particulate control, no direct exhaust.
- (6) Mold preparation area with no direct exhaust.
- (7) 2 part urethane foam unit.

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

A.1.1 326-IAC 8-1-6 BACT (Best Available Control Technology)

Pursuant to OP 20-10-93-0693 issued on June 18,1990, BACT shall be as follows:

- (a) use of resins, gel coats and solvents in the one (1) gelcoat booth and one (1) lamination booth shall be limited such that the potential to emit (PTE) volatile organic compounds shall be less than 100 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: CFA Unified Emissions Factors for Open Molding of Composites July 23, 2001, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.