INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

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Commissioner

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

September 1, 2004

TO: Interested Parties / Applicant

RE: Owens Corning Fabricating Solutions / 039-18917-00002

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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 impractible 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.

Enclosures
FNTV-PMOD.doc 9/16/03

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September 1, 2004

Mr. Craig Ray
Owens Corning Fabricating Solutions
16710 Maple City Drive
Goshen, Indiana 46526

Re: 039-18917-00002
Second Significant Permit Modification to:
Part 70 permit No.:T039-6091-00002

Dear Mr. Ray:

Owens Corning Fabricating Solutions was issued a Part 70 permit T039-6091-00002 on December 27, 2000 for a fiberglass panel manufacturing plant. A letter requesting changes to this permit was received on March 16, 2004. Pursuant to 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of using Vacuum Infusion Process (VIP) for the existing fiberglass panel manufacturing lines A and B, adding high efficiency dust collectors to the existing grinder machines, and correcting the maximum throughput rate for each woodworking operation.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG,1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section
Administrative and Development -Sara Cloe
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Owens Corning Fabricating Solutions
(formerly Fabwel Composites, Inc.)
16710 Maple Drive
Goshen, Indiana 46526

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval 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.: T039-6091-00002	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 27, 2000 Expiration Date: December 27, 2005

First Significant Permit Modification No.: 039-17700-00002, issued November 20, 2003

Second Significant Permit Modification No.: 039-18917-00002	Pages Affected: 5-6, 18, 28-39, 45
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 1, 2004

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a fiberglass panel manufacturing operation.

Responsible Official:	Plant Manager
Source Address:	16710 Maple Drive, Goshen, Indiana 46526
Mailing Address:	16710 Maple Drive, Goshen, Indiana 46526
Phone Number:	(574) 534-3447
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under 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) One (1) fiberglass panel manufacturing line, identified as the "A" line and Unit 001, consisting of one (1) optimized spray or equivalent gel coat application system**,** one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, with dry filters for overspray control, and exhausting at eleven (11) stacks, identified as SV-25 through SV-35. (Constructed in 1987, and modified in 2004)

(b) One (1) fiberglass panel manufacturing line, identified as the "B" line and Unit 001, consisting of one (1) optimized spray or equivalent gel coat application system, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, with dry filters for overspray control, and exhausting to ten (10) stacks designated as SV-36 through SV-45. (Constructed in 1998 and modified in 2004)

(c) One (1) fiberglass panel manufacturing line, identified as the "C" line and Unit 003, consisting of two (2) optimized spray or equivalent gel coat application systems, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through five (5) stacks designated as CEX1-CEX5, with dry filters for overspray. (Constructed in 2000 and modified in 2003)

(d) One (1) Lauan woodworking station for lines A, B, and C, identified as Unit 002, with a maximum raw material input rate of 5,063 pounds per hour, consisting of one (1) wide belt sander, one (1) table saw, one (1) chop saw, and one (1) panel saw, all controlled by one (1) Honeyville baghouse, exhausting to stack S002. (Constructed in 1988)

(e) One (1) standby woodworking shop equipment for lines A, B, and C, identified as Unit 004, with a maximum throughput rate of 5,063 pounds of raw material per hour, consisting of one (1) wide belt sander, controlled by one (1) Torit cyclone/dust collector exhausting to stack S004. (Constructed in 1998 and 2000)

(f) One (1) panel grinding/trimming station for lines A and B, identified as Unit 005, with a maximum raw material input rate of 11,050 Ib/hr, consisting of the following (constructed in 1988 and modified in 1998 and 2004):

(1) One (1) trimming operation, including one (1) CNC panel saw, two (2) hand saws, and one (1) vertical saw, controlled by one (1) baghouse (CDC1), exhausting to stack S005.

(2) One (1) grinding operation, including four (4) hand grinders, each controlled by a high efficiency dust collector and/or baghouse CDC1.

(g) One (1) panel CNC saw for line C, identified as Unit 006, with a maximum throughput rate of 5,525 pounds of raw material per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, exhausting to stack S006. (Constructed in 2000)

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of 5,525 pounds per hour, controlled by one (1) UAS interior baghouse and one (1) UAS dust collector (Dust Hog), exhausting to stack S006. This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors. (Constructed in 2000)

(i) One (1) vertical saw for Line C, identified as 008, with a maximum throughput rate of 5,525 pounds of raw materials per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, and exhausting to stack S006. (Constructed in 2002)

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

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

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

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

(e) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
Sulfur Dioxides (S02) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day
Carbon Monoxide (CO) = 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day

(1) One (1) arc welder, using type E6013 electrode, with a maximum electrode consumption rate of 0.094 pounds per hour.

(2) Two (2) styrene monomer storage tanks. each with an annual throughput of 85537 gallons per year, identified as 009a and 009b.

(3) Two (2) styrene resin storage tanks, each with a capacity of 6,000 gallons.

(4) Four (4) natural gas air make-up units, designated as AM012-AM015, with a maximum heat input capacity of 0.044 million British thermal units per hour (MMBtu/hr) each.

(5) One (1) natural gas air make-up unit, designated as AM016 , with a maximum heat input capacity of 0.012 MMBtu/hr each.

(6) Eight (8) infrared tube heaters each rated a 0.120 MMBtu/hr, identified as 017-024 and three (3) infrared tube heaters each rated at 0.075 MMBtu/hr, identified as 025-027.

(7) One (1) office furnace rated at 0.125 MMBtu/hr identified as 028.

(8) One (1) air make-up unit rated at 0.880 MMBtu/hr identified as AM029, three (3) air make-up units each rated at 3.745 MMBtu/hr identified as AM030-032, and one (1) air make-up unit rated at 3.075 MMBtu/hr identified as AM033.

(9) Fourteen (14) Radiant Tube type heaters rated at 0.1 million (MM) btu/hr each, two (2) Unit Heaters rated at 0.69 million MMBtu/hr each, six (6) air make-up units rated at 3.008 MMBtu/hr each.

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 CONSTRUCTION CONDITIONS

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

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

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

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.3 Enforceability [3261AC 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.4 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.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 Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. 0. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) 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).

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) 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.

B.9 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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal.

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

B.10 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 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, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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) Operations may continue during an emergency only if the following conditions are met:

(1) 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.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) CP No.039-9288-00002, issued on August 6, 1998, Condition D. 1.3, (New Source Toxics Control), has been revised upon request of the source and agreement from IDEM, OAQ. Since Fabwel is using an alternative method to the standard MACT for 326 IAC 2-1-3.4, now 326 IAC 2-4.1-1 , only that language

will be contained in this permit. If Fabwel decides to demonstrate compliance with 326 IAC 2-4.1-1 , the change will require a modification to the Title V permit and prior IDEM, OAQ approval before that change may occur .

(d) 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, including any term or condition from a previously issued construction or operation permit, 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 .

(e) 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.

(f) 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.

(g) 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).

(h) 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)]

(i) 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)(7)]

B.14 Multiple Exceedances [3261AC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

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

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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 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 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source,

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

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

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

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

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 5O2(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) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 5O2(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(A) A brief description of the change within the source;

(B) The date on which the change will occur;

(C) Any change in emissions; and

(D) Any permit term or condition that is no longer applicable as a result of the change.

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).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.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 (BLT)), to determine the appropriate permit fee.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

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(c)

Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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 Exemptions), 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. The provisions of 326 IAC 9-1-2 is not federally enforceable.

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 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The 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) 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 that the inspector be accredited pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.9 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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. 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.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [3261AC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case

of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 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, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

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

C.15 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan -Failure to Take Response Steps [3261AC 2-7-5][326 IAC 2-7-6] c [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section a shall be performed at all times the equipment is operating. If monitoring is required by Section a and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section a, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter .

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [3261AC 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 corrective actions. The Permittee shall submit a description of these corrective 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 corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The documents submitted pursuant to this condition do not 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.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

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

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

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

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

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information 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 kept 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) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 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 FACILITY OPERATION CONDITIONS

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

(a) One (1) fiberglass panel manufacturing line, identified as the "A" line and Unit 001, consisting of one (1) optimized spray or equivalent gel coat application system**,** one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, with dry filters for overspray control, and exhausting at eleven (11) stacks, identified as SV-25 through SV-35. (Constructed in 1987, and modified in 2004)

(b) One (1) fiberglass panel manufacturing line, identified as the "B" line and Unit 001, consisting of one (1) optimized spray or equivalent gel coat application system, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, with dry filters for overspray control, and exhausting to ten (10) stacks designated as SV-36 through SV-45. (Constructed in 1998 and modified in 2004)

(c) One (1) fiberglass panel manufacturing line, identified as the "C" line and Unit 003, consisting of two (2) optimized spray or equivalent gel coat application systems, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through five (5) stacks designated as CEX1-CEX5, with dry filters for overspray. (Constructed in 2000 and modified in 2003)

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

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

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to CP No. 039-4937-00002, the BACT for the fiberglass panel manufacturing line, identified as line "A", is use of an air assisted airless application system for the gel coat line, and use of an airless application or equivalent system for the resin/chop line, with no add-on control devices.

(b) Pursuant to CP No.039-9288-00002, issued on August 6, 1998, the fiberglass panel manufacturing line, identified as line “B”, is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for this fiberglass panel manufacturing line, identified as line "B" shall be satisfied by the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

(c) Pursuant to SSM No. 039-12284-00002, issued on October 13, 2000, the fiberglass panel manufacturing line, identified as line "C", is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for this fiberglass panel manufacturing line, identified as line "C" shall be satisfied by the MACT determination of 326 IAC 2-4.1-1 (New Source Toxics Control).

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to the 326 IAC 4.1-1 (MACT) and 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following requirements for the fiberglass panel manufacturing lines A, B, and C:

(a) Pursuant to CP #039-9228-00002, issued on August 6, 1998, use of resins and gel coats in lines A and B shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This also makes the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to the modification in 2004.

(b) Pursuant to SSM #039-17785-00002, issued on November 5, 2003, use of resins and gel coats in line C shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 129.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit ensures the net VOC increase is less than 40 tons/yr for the modification in 2003 and makes the requirements of 326 IAC 2-2 (PSD) not applicable.

(c) Compliance with the emission limits in (a) and (b) of this condition shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used 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) The emission factors approved for use by IDEM, OAQ for open molding processes shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001. The emission factor for the VIP application system (closed molding) is 1% by weight of the HAP monomer content, which is provided by the American Composites Manufacturers Association (ACMA). For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(d) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Open Molding Production 1 Gel Coat	36
Open Molding Production Resin	35
VIP Production Resin	40

[1]Production refers to the manufacture of parts.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

(e) Non-atomized spray or equivalent application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(f) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(g) The listed work practices shall be followed for the fiberglass panel manufacturing lines "A", "B", and "C":

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work.

(B) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

D.1.3 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

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

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

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

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

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

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

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

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

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

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

D.1.4 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

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

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

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

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

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

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

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(g) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

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

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the fiberglass panel manufacturing lines A, B, and C shall be limited by the following:

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

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

D.1.6 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 line "A" line, "B", and line "C" and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4(a)] [326 IAC 8-1-2(a)]

Compliance with the volatile organic HAP content and usage limitations contained in Condition 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.1.8 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Compliance with the limitations contained in Condition D.1.2 may be demonstrated using monthly emission averaging <u>within</u> each resin or gel coat application category by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

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

For Averaging within a category:

$Em_A \leq (M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on allowable monomer content **and allowable application method** for each category.
Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

D.1.9 Particulate Matter (PM)

(a) Pursuant to CP No.039-4937 -00002, issued on March 21, 1996, the dry filter control shall be in operation at all times when the fiberglass panel manufacturing line, identified as the "A" line, is in operation.

(b) Pursuant to CP No.039-9288-00002, issued on August 6, 1998, the dry filters for PM control shall be in operation at all times when the fiberglass panel manufacturing line. identified as the "B" line.

(c) Pursuant to CP No.039-12284-00002, issued on October 13, 2000, the dry filters for PM control shall be in operation at all times when the fiberglass panel manufacturing line, identified as the "C" line.

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

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, when the lines are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks 25 through 45, and stacks CEX1 through CEX5 while one or more of the spray applicators are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

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

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

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

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permitted shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and monomer content limits established in Condition D.1.2.

(1) The amount of each resin and gel coat used. The VOC and mass weighted monomer content of each resin and gel coat 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 volume weighted volatile organic HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total volatile organic HAP usage for each month;

(6) The weight of volatile organic HAP emitted for each compliance period;

(7) Method of application and other emission reduction techniques for each resin and gel coat used for each month.

(b) To document compliance with Condition D.1.10, the Permitted shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.4, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

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

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

D.1.12 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(d) One (1) Lauan woodworking station for lines A, B, and C, identified as Unit 002, with a maximum raw material input rate of 5,063 pounds per hour, consisting of one (1) wide belt sander, one (1) table saw, one (1) chop saw, and one (1) panel saw, all controlled by one (1) Honeyville baghouse, exhausting to stack S002. (Constructed in 1988)

(e) One (1) standby woodworking shop equipment for lines A, B, and C, identified as Unit 004, with a maximum throughput rate of 5,063 pounds of raw material per hour, consisting of one (1) wide belt sander, controlled by one (1) Torit cyclone/dust collector exhausting to stack S004. (Constructed in 1998 and 2000)

(f) One (1) panel grinding/trimming station for lines A and B, identified as Unit 005, with a maximum raw material input rate of 11,050 Ib/hr, consisting of the following (constructed in 1988 and modified in 1998 and 2004):

(1) One (1) trimming operation, including one (1) CNC panel saw, two (2) hand saws, and one (1) vertical saw, controlled by one (1) baghouse (CDC1), exhausting to stack S005.

(2) One (1) grinding operation, including four (4) hand grinders, each controlled by a high efficiency dust collector and/or baghouse CDC1.

(g) One (1) panel CNC saw for line C, identified as Unit 006, with a maximum throughput rate of 5,525 pounds of raw material per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, exhausting to stack S006. (Constructed in 2000)

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of 5,525 pounds per hour, controlled by one (1) UAS interior baghouse and one (1) UAS dust collector (Dust Hog), exhausting to stack S006. This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors. (Constructed in 2000)

(i) One (1) vertical saw for Line C, identified as 008, with a maximum throughput rate of 5,525 pounds of raw materials per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, and exhausting to stack S006. (Constructed in 2002)

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

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

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

Particulate emissions from the operations 002, 004, 005, 006, 007 and 008 shall be limited to the emission limits listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
002	5,063	7.64
004	5,063	7.64
005	11,050	12.9
006	5,525	8.10

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
007	5,525	8.10
008	5,525	8.10

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 PSD Minor Limits [326 IAC 2-2]

(a) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM and PM10 emissions from operations 002, 004, 006, 007, and 008 shall not exceed the emissions limits listed in the table below:

Unit ID	PM10 Emission Limit (lbs/hr)	PM Emission Limit (lbs/hr)
002	0.21	0.42
004	0.92	1.80
006, 007, and 008	1.14	2.24

This is equivalent to 9.94 tons/yr of PM10 emissions and 19.5 tons/yr of PM emissions. Combined with the PM/PM10 emissions from fiberglass panel manufacturing line C (003), the particulate emissions from Significant Source Modification #039-17785-00002~~,~~ are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

(b) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(1) The PM/PM10 emissions from the trimming operations after control shall not exceed 2.84×10^{-4} lbs/ft^2.

(2) The PM/PM10 emissions from the grinding operations after control shall not exceed 3.70×10^{-3} lbs/ft^2.

(3) The total fiberglass panel input to Unit 005 shall be limited to less than 17,500,000 square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to 34.9 tons/yr of PM/PM10 emissions from Unit 005. Combined with the PM/PM10 emission increase from fiberglass panel manufacturing lines A and B, the particulate emission increases from SSM #039-18680-00002 are limited less than 15 tons/yr for PM10 and less than 25 tons/yr for PM.

D.2.3 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 the operations 002, 004, 005, 006, 007, and 008, and any control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM) and PM10

The dust collectors and baghouses for PM and PM10 control shall be in operation and control emissions from the operations 002, 004, 005, 006, 007 and 008 at all times that these units are in operation.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations from the baghouses, dust collectors/cyclone for the woodworking and finishing operations 002, 004, 005, 006, 007, and 008 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. 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 batch or 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses and dust collectors used in conjunction with the woodworking and finishing operations 002, 004, 005, 006, 007, and 008, at least once a week when these woodworking and finishing operations are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for anyone reading. 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 - Compliance Response Plan shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the operations 002, 004, 005, 006, 007, and 008 when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.2(b)(3), the Permittee shall maintain monthly records of the total surface area of the fiberglass panels input to Unit 005.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain daily visible emission notations of the woodworking stations stack exhaust.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain the weekly records of the total static pressure drop during normal operation when venting to the atmosphere.

(d) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

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

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2(b)(3) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002

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) _____

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:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002

This form consists of 2 pages **Page 1 of 2**

9 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 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:

Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_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 Quarterly Report

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002
Facility: fiberglass panel manufacturing lines, identified as line “A” and line “B”.
Parameter: VOCs
Limit: VOC emissions less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Usage This Month (tons/month)	Usage for Previous 11 Months (tons)	Usage for Previous 12 Month Period (tons)	Emissions This Month (tons/month)	Emission For Previous 11 Months (tons)	Emissions for Previous 12 Month Period (tons)
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
Compliance Data Section

Part 70 Quarterly Report

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002
Facility: One (1) fiberglass panel manufacturing line, identified as line "C".
Parameter: VOC/HAP PTE
Limit: VOC emissions less than 129.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Usage This Month (tons/month)	Usage for Previous 11 Months (tons)	Usage for Previous 12 Month Period (tons)	Emissions This Month (tons/month)	Emission For Previous 11 Months (tons)	Emissions for Previous 12 Month Period (tons)
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
Compliance Data Section

Part 70 Quarterly Report

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002
Facility: Unit 005
Parameter: Total surface area of the fiberglass panels processed
Limit: Less than 17,500,000 square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002

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

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

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

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

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Owens Corning Fabricating Solutions
Source Location:	16710 Maple City Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T039-6091-00002
Operation Permit Issuance Date:	December 27, 2000
Significant Source Modification No.:	039-18680-00002
Significant Permit Modification No.:	039-18917-00002
Permit Reviewer:	ERG/YC

On July 7, 2004, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana stating that Owens Corning Fabricating Solutions had applied for a Part 70 Significant Source Modification and a Part 70 Significant Permit Modification to use a Vacuum Infusion Process (VIP) for the existing fiberglass panel manufacturing lines A and B. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 should be issued as proposed.

On July 28, 2004, Owens Corning Fabricating Solutions submitted comments on the proposed Significant Source Modification and the Significant Permit Modification. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment 1:

The source stated that the “exterior baghouse” referred to in the unit description for Unit 007 is the “UAS dust collector (Dust Hog)” referred to in the description for Units 006 and 008. In order to be consistent with the unit description for other units, the source requested to change the name of this control device from “exterior baghouse” to “UAS dust collector (Dust Hog)” in the description for Unit 007.

Response to Comment 1:

The unit description for Unit 007 in Conditions A.2 and D.2 has been revised as follows as a result of this comment:

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

. . .

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of 5,525 pounds per hour, controlled by one (1) UAS interior baghouse and one (1) ~~exterior baghouse~~ **UAS dust collector (Dust Hog)**, exhausting to stack S006. This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors. (Constructed in 2000)

. . .

SECTION D.2 FACILITY OPERATION CONDITIONS

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

. . .

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of 5,525 pounds per hour, controlled by one (1) UAS interior baghouse and one (1) ~~exterior baghouse~~ **UAS dust collector (Dust Hog)**, exhausting to stack S006. This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors. (Constructed in 2000)

. . .

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

Comment 2:

The source stated that there is a typographical error in the fiberglass panel throughput limit in Condition D.2.2(b)(3) and the Technical Support Document (TSD). The allowable fiberglass panel throughput rate for Unit 005 should be 17,500,000 square feet per year, instead of 1,750,000 square feet per year. The source requested this error be corrected in both the permit and the TSD.

Response to Comment 2:

According to the emission calculation in Appendix A of the TSD, the maximum allowable fiberglass panel throughput rate for Unit 005 is 17,500,000 square feet per year, which is equivalent to 34.9 tons/yr of PM/PM10 emissions. Combined with the PM/PM10 emissions from the modified fiberglass panel manufacturing lines, the particulate emission increase from this modification is limited to less than 25 tons/yr for PM and less than 15 tons/yr for PM10. Therefore, Condition D.2.2(b)(3) and the corresponding quarterly report form have been revised as follows:

D.2.2 PSD Minor Limits [326 IAC 2-2]

. . .

(b) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(3) The total fiberglass panel input to Unit 005 shall be limited to less than ~~1,750,000~~ **17,500,000** square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name:	Owens Corning Fabricating Solutions
Source Address:	16710 Maple Drive, Goshen, Indiana 46526
Mailing Address:	16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.:	039-6091-00002
Facility:	Unit 005
Parameter:	Total surface area of the fiberglass panels processed
Limit:	Less than ~~1,750,000~~ **17,750,000** square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document.

Comment 3:

The source stated the text in the last paragraph of item (b) in the History section of the TSD should be corrected to “The installation of control devices does **not** affect the potential to emit from the existing grinding operations” .

Response to Comment 3:

IDEM, OAQ agrees that the installation of control devices does not affect the potential to emit of the existing units before control and is not considered a modification to the existing units. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Owens Corning Fabricating Solutions
Source Location:	16710 Maple City Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T039-6091-00002
Operation Permit Issuance Date:	December 27, 2000
Significant Source Modification No.:	039-18680-00002
Significant Permit Modification No.:	039-18917-00002
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Owens Corning Fabricating Solutions relating to the modification of the following emission units and pollution control devices:

(a) One (1) fiberglass panel manufacturing line, identified as the "A" line and Unit 001, equipped with one (1) optimized spray or equivalent gel coat application system, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through eleven (11) stacks, identified as SV-25 through SV-35. (Constructed in 1987 and modified in 2004)

(b) One (1) fiberglass panel manufacturing line, identified as the "B" line and Unit 001, equipped with one (1) optimized spray or equivalent gel coat application system, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through twelve (12) stacks, identified as SV-36 through SV-47. (Constructed in 1998 and modified in 2004)

History

Owens Corning Fabricating Solutions is an existing fiberglass panel manufacturing plant and an existing emission offset major source. Their Title V permit (T039-6091-00002) was issued on December 27, 2000. On March 16, 2004, the Permittee submitted an application to the OAQ requesting the following changes to their existing plant:

(a) Allowing the source to use the Vacuum Infusion Process (VIP) resin application system for the existing fiberglass panel manufacturing lines A and B (Unit 001) and to install a “moving mold” system to these lines:

The moving mold system would allow the source to maneuver fiberglass panels automatically between processes. This system will operate in a long, continuous booth-type enclosure and will improve worker efficiency and safety.

The use of VIP resin application is a closed molding-type technique which reduces the VOC and HAP emissions from the fiberglass panel manufacturing process. According to the website of the American Composites Manufacturers Association (ACMA), the VOC emission factor for the closed molding process is 1% by weight of the styrene used (20 lbs/ton).

Pursuant to 326 IAC 2-4.1 (MACT) and CP #039-9288-00002, issued on August 6, 1998, the VHAP emissions from the use of resins and gel coats for panel manufacturing lines A and B shall be limited to less than 249 tons per twelve (12) consecutive month period. The source proposed to maintain this VHAP emission limit for lines A and B. Since VHAP emissions from each panel will decrease when using VIP resin application technique, this modification will increase the panel production rate in lines A and B, and result in increased utilization of the existing panel grinding/trimming station for lines A and B (Unit 005).

Note that the fiberglass panels produced by a VIP method do not require lauan wood panels. Due to their high strength, the fiberglass panels produced by the VIP method do not go through the grinding process (only trimming) at Unit 005. Therefore, this modification will not increase utilization of the existing lauan woodworking operations for lines A and B (Units 002 and 004). The source also proposed to limit the maximum HAP content of the resin used for the VIP method to less than 40% by weight.

This source is an existing Emission Offset major source. The VOC increase from this modification is less than 40 tons/yr. The source has elected to comply with a throughput limit for Unit 005 to limit the total PTE increase of this modification to less than 25 tons/yr for PM and 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable to this modification.

(b) Adding high efficiency dust collectors:

The source stated that they may add high efficiency dust collectors to the following emission units:

(1) Four (4) hand grinders for lines A and B (Unit 005), which are currently controlled by baghouse CDC1.

(2) Two (2) panel grinding machines for line C (Unit 007), which are currently controlled by an existing interior baghouse and an exterior baghouse.

The installation of control devices does affect the potential to emit from the existing grinding operations. Therefore, the installation of dust collectors are not considered modifications to Units 005 and 007.

(c) Revising the maximum throughput rate for each woodworking operation as follows:

The source stated that the throughput rates listed in SPM #039-17700-00002, issued on November 20, 2003, counted only the weight of the lauan boards and did not include the weight of the gel coat or resin contained in the fiberglass panels. Therefore, the source requested the maximum throughput rate for each woodworking operation be revised to the rate listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)
002	5,063
004	5,063

Unit ID	Max. Throughput Rate (lbs/hr)
005	11,050
006	5,525
007	5,525
008	5,525

The source has provided the panel production records for each unit in 2002 and 2003. These records show that the actual throughput rates for these units did not change significantly and are greater than the maximum rates listed in SPM #039-17700-00002, issued on November 20, 2003. Therefore, the maximum throughput rates for these units have been corrected in the revised permit.

(d) Adding one (1) vertical saw with the existing trimming operation of Unit 005. This unit will be controlled by the existing baghouse CDC1.

(e) Revising the stack number for existing fiber glass panel manufacturing line B. The source stated that the emissions from this line exhaust through stacks SV-36 through SV-45.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on March 16, 2004. Additional information was received on April 30, 2004, May 11, 2004, and June 14, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of Modification

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

Pollutant	Potential To Emit (tons/year)
PM	1,309
PM-10	1,309
SO_2	--
VOC	253
CO	--
NO_x	--

HAP's	Potential To Emit (tons/year)
Styrene	191
MMA	61.8
MEK	0.74
TOTAL	253

Justification for Modification

This modification is being performed through a Part 70 Significant Source Modification because: (1) the potential to emit of this modification is greater than 25 tons/yr for PM, PM10, and VOC pursuant to 326 IAC 2-7-10.5(f)(4); and (2) the potential to emit of this modification is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs pursuant to 326 IAC 2-7-10.5(f)(6). The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_x	Attainment
8-Hour Ozone	Nonattainment
1-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) and 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	10
PM-10	10
SO_2	0
VOC	Less than 379
CO	1.0
NOx	3.0

(a) This existing source is an Nonattainment NSR major stationary source because an nonattainment regulated pollutant (VOC) is emitted at a rate of one hundred (100) tons per year or more, and it is not in one (1) of the twenty-eight (28) listed source categories.

(b) These emissions (except for VOC emissions) are based upon the 2001 emission inventory data from the source. The VOC emissions from the entire source are currently limited to less than 379 tons/yr, pursuant to SPM #039-17700-00002, issued on November 20, 2003.

Potential to Emit of Modification After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
PTE of Lines A and B (Unit 001)	Less than 9.74	Less than 9.74	--	Less than 249	--	--	Less than 249
PTE of Panel Grinding/Trimming Station (Unit 005)	Less than 34.9	Less than 34.9	-	-	-	-	-
*Actual Emissions from Unit 001	7.12	7.12	--	217	--	--	217
*Actual Emissions from Unit 005	22.7	22.7	--	--	--	--	--
**Total PTE of this Modification	Less than 14.8	Less than 14.8	--	Less than 32.0	--	--	Less than 32.0
NSR Significant Thresholds	25	15	40	40	100	40	NA

Note: (*)The actual emissions for units 001 and 005 are the averaged emissions for these units in 2002 and 2003, which was provided by Owens Corning Fabricating Solutions in the application received on March 16, 2004.
(**) Total PTE of this Modification = (PTE of the Modified Units) - (Actual Emissions of the Modified Units).

This modification to an existing Nonattainment NSR major source is not major because the emission increase is less than the Nonattainment NSR significant levels. Therefore, the requirements of Nonattainment NSR do not apply.

Federal Rule Applicability

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

(b) This source does not have a spin wool fiberglass insulation manufacturing line. Therefore, the New Source Performance Standards for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60.680 - 60.685, Subpart PPP) are not applicable.

(c) This source does not apply surface coating to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not applicable.

(d) The fiberglass panel manufacturing Lines A and B Unit (001) manufacture products with thermoset resins and gel coats. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production Facilities (40 CFR Part 63.5780 - 63.5935, Subpart WWWW) are applicable. Pursuant to 40 CFR 63.5795, this source is considered an existing HAP major source under 40 CFR 63, Subpart WWWW. Therefore, it is required to comply with this NESHAP by April 21, 2006, pursuant to 40 CFR 63.5800. Since the source's current Title V permit expires on December 27, 2005, the NESHAP requirements for 40 CFR Subpart WWWW will not be addressed in this modification, or included in the permit modification. The requirements of 40 CFR 63, Subpart WWWW will be included in the source's Title V renewal permit.

(e) This modification does involve a pollutant-specific emissions unit (Unit 005) as defined in 40 CFR 64.1:

(1) With the potential to emit before controls equal to or greater than the major source threshold;

(2) That is subject to an emission limitation or standard; and

(3) Uses a control device (baghouses and dust collectors) as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, Unit 005 is subject to the requirements of 40 CFR 64 (Compliance Assurance Monitoring). Since the potential to emit PM10 after control for Unit 005 is less than the Part 70 major source thresholds, the CAM requirements will be addressed in the source's Part 70 renewal permit.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Nonattainment NSR)

This source was constructed in 1987, and modified in 1998, 2000, 2003, and 2004 (this modification). This source is located in Elkhart County, which was redesignated as nonattainment area for 8-hour ozone standard. This source is not in 1 of 28 source categories and has potential to emit VOC greater than 100 tons/yr. Therefore, this existing source is a major source under Nonattainment NSR.

The potential to emit VOC of this modification is greater than 40 tons/yr. In order to make this modification minor, the source has proposed to limit the VOC emissions from the use of resin and gel coat in the fiberglass panel manufacturing lines A and B (Unit 001) to less than 249 tons per twelve (12) consecutive month period. Since the averaged actual VOC emissions from these lines are 217 tons/yr (based on the actual emission information in 2002 and 2003), the VOC emission increase from this modification is less than 40 tons/yr (249 tons/yr - 217 tons/yr = 32 tons/yr). Therefore, the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

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

This source was constructed in 1987, and modified in 1998, 2000, 2003, and 2004 (this modification). This existing source is a NSR major source and the potential to emit of this modification before control is greater than 25 tons/yr for PM and greater than 15 tons/yr for PM10. In order to make this modification minor, the source has proposed the following requirements for Unit 005:

(a) The PM/PM10 emissions from the trimming operations after control shall not exceed 2.84 x 10^{-4} lbs/ft^2. The use of baghouses ensures compliance with this limit.

(b) The PM/PM10 emissions from the grinding operations after control shall not exceed 3.70 x 10^{-3} lbs/ft^2. The use of dust collectors and/or baghouses ensures compliance with this limit.

(c) The total fiberglass panel input to Unit 005 shall be limited to less than 1,750,000 square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to 34.9 tons/yr of PM/PM10 emissions from Unit 005 (including trimming and grinding operations). The actual emissions from this unit is 22.7 tons/yr (based on the actual emission information in 2002 and 2003). Combined with the PM/PM10 emission increase from fiberglass panel manufacturing lines A and B, the PM/PM10 emission increase from this modification is less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-4.1 (New Source Toxic Control)

The potential to emit HAP from this modification is greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. However, the modification to the existing fiberglass panel manufacturing lines A and B are not considered reconstructions to the existing lines and these existing lines are subject to 40 CFR 63, Subpart WWWW (NESHAP for Reinforced Plastic Composites Production Facilities). Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

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 the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability - Fiberglass Panel Manufacturing Lines A and B (Unit 001)

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

The fiberglass panel manufacturing lines A and B were constructed after 1980 and each has potential VOC emissions greater than 25 tons/yr. Therefore, these two manufacturing lines are subject to the requirements of 326 IAC 8-1-6 and are required to control VOC emissions with Best Available Control Technology (BACT).

Pursuant to CP #039-4937-00002, issued on March 21, 1996, the BACT for line A was determined to be the use of air assisted airless application for gel coat, and the use of an airless application or equivalent for resin. Pursuant to CP #039-9288-00002, issued on August 6, 1998,

the BACT for line B was determined to be same as the MACT requirements for line B, which include the following:

(a) The VHAP emission limits from the use of resins and gel coats in lines A and B (Unit 001) shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The HAP monomer contents of resins and gel coats used at line B shall not exceed the limits listed in the table below:

Material	HAP Monomer Content % by Weight
Gel Coats (including tooling gel coat)	36%
Resins (including tooling resin)	35%

(c) Overhead mechanized spray reciprocators shall be used to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAQ. The spray gun type shall be high volume low pressure (HVLP) or equivalent.

(d) Minimizing the period of roll-out and placement of wood reinforcing panels immediately after the last resin application.

The source proposed to maintain the current VOC emission limit of 249 tons/yr for lines A and B. Since the proposed VIP resin application method is a closed molding operation which emits fewer VOCs, this modification will not increase the potential to emit VOC of the fiberglass panel manufacturing lines A and B. Therefore, no BACT analysis is required for this modification.

After this modification, the resin and gel coat application processes in lines A and B will be similar to the existing line C, which is the most recent installed fiberglass panel manufacturing line with the most stringent requirements. In order to be consistent with the BACT for the existing line C and to allow the source to use VIP resin application method for lines A and B, the source has requested to revise the BACT for lines A and B to be consistent with the requirements for line C. The proposed BACT is listed as follows:

(a) The VHAP emission limits from the use of resins and gel coats in lines A and B (Unit 001) shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Open Molding Production [1] Gel Coat	36
Open Molding Production Resin	35
VIP Production Resin	40

[1]Production refers to the manufacture of parts.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

(c) Non-atomized spray or equivalent application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

Note: The source currently uses controlled spray application with covered cure to apply resin. According to the emission factors provided by Composites Fabricators Association, dated July 23, 2001, the method of controlled spray application with covered cure emits less VHAPs than the method of non-atomized spray application. The VIP method is a close molding operation, which also emits less VHAPs than the non-atomized spray application method. Therefore, the modified lines A and B will be in compliance with the revised application technology requirement.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

The potential to emit HAP of this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination HAPs. In addition, this source has actual styrene emissions greater than 3 tons/yr. Therefore, fiberglass panel manufacturing lines A and B (Unit 001) are subject to 326 IAC 20-25 and shall comply with the following requirements on or after January 1, 2002:

Emission Standards

The Permittee shall comply with the HAP monomer content specified in 326 IAC 20-25-3(a). However, the HAP content limits in the current BACT for lines A and B are the more stringent requirements for these lines. Pursuant to 326 IAC 20-25-1(b), the more stringent requirements (HAP content limits) shall apply to fiberglass panel manufacturing lines A and B.

Application Technology

Pursuant to 326 IAC 20-25-3(b), the Permittee shall use non-atomized or manual application for resin applicators at lines A and B. Pursuant to IAC 20-25-3(b), the gel coat applicators shall be non-atomized, air-assisted airless, airless, HVLP, or the equivalent applications.

Currently, the source does not use non-atomized applicators for resin due to the poor product quality. The source uses mechanical atomized spray applicators with dry filters and will use VIP application method (close molding) for the resin applicators. The source conducts annual operator training in accordance with the procedures documented in the “Composites Fabricators Association (CFA) Controlled Spraying Handbook”. Therefore, the spray applicators at this source are considered “controlled” and this has been verified by the source’s inspector, Mr. Greg Wingstrom. In addition, the source uses covered cure (vacuum bagging) for the molding processes without roll-out.

Since the VOC/HAP emission factors for atomized controlled spray applicators with covered cure or close molding application methods are lower than emission factors for non-atomized spray applicators, the source is currently using better resin application technology than non-atomized application as required in 326 IAC 20-25-3. Therefore, the Permittee is allowed to use “non-atomized or equivalent” for the resin applicators at lines A and B.

Work Practice Standards

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

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

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

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

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

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

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

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

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

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

Operator Training

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

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

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

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

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

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

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(g) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

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

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the fiberglass panel manufacturing lines A and B (Unit 001) shall be limited by the following:

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

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

Pursuant to the revised 326 IAC 6-3-2(d), particulate from these spray applicators shall be controlled by dry filters, or equivalent control devices, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This source currently uses dry filters to control overspray. Therefore, fiberglass panel manufacturing lines A and B are in compliance with 326 IAC 6-3-2.

State Rule Applicability - Woodworking and Finishing Operations

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

The source requested to correct the maximum throughput rate for the existing woodworking and finishing operations (002, 004, 005, 006, 007 and 008) due to incorrect information submitted during the review of SPM #039-17700-00002, issued on November 20, 2003. Pursuant to 326 IAC 6-3-2, particulate emissions from Units 002, 004, 005, 006, 007 and 008 shall be limited to less than the emission rates listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
002	5,063	7.64

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
004	5,063	7.64
005	11,050	12.9
006	5,525	8.10
007	5,525	8.10
008	5,525	8.10

The pounds per hour limitation was calculated using the following equation:

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

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

The use of baghouses or dust collectors ensures compliance with these limits.

Compliance Requirements

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

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

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

1. The spray applicators in fiberglass panel manufacturing lines A and B (Unit 001) have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks 25 through 45 while one or more of the spray applicators are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

   (b) Monthly inspections shall be performed of the emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance

Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission occurs or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because these spray applicators must operate properly to ensure compliance with 40 CFR 52, Subpart P.

2. The panel grinding/trimming station for lines A and B (Unit 005), which is controlled by dust collectors and a baghouse, has applicable compliance monitoring conditions as specified below:

(a) Visible emissions notations of the stack exhaust of Unit 005 (stack S005) shall be performed daily during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. 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. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall monitor and record the pressure drop for the baghouse at least once per week when Unit 005 is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within 2.0 and 4.0 inches of water, or a range established during the latest compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside the above mention range.

(c) All defective bags shall be replaced. In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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.

These monitoring conditions are necessary because the baghouse and dust collectors equipped with Unit 005 must operate properly to ensure compliance with 326 IAC 6-3-2 (Manufacturing Processes).

Proposed Changes

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

The Permittee owns and operates a fiberglass panel manufacturing operation.

Responsible Official:	Plant Manager
Source Address:	16710 Maple Drive, Goshen, Indiana 46526
Mailing Address:	16710 Maple Drive, Goshen, Indiana 46526
Phone Number:	(574) 534-3447
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	**Nonattainment for ozone under 8-hour standard** Attainment for all **other** criteria pollutants
Source Status:	Part 70 Permit Program Major Source under ~~PSD~~ **Nonattainment NSR** ~~Rules~~; 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) One (1) fiberglass panel manufacturing line, identified as the "A" line and Unit 001, consisting of ~~three (3) fiberglass panel reciprocators, each equipped with~~ one (1) optimized spray or equivalent gel coat application system**,** ~~and~~ one (1) non-atomized or equivalent resin application system **with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system,** with dry filters for overspray **control,** and exhausting at eleven (11) stacks, identified as SV-25 through SV-35**.** ~~Only two (2) of the three (3) reciprocators may be operated simultaneously, with the third reciprocator used as a back-up.~~ (Constructed in 1987**, and modified in 2004**)

(b) One (1) fiberglass panel manufacturing line, identified as the "B" line and Unit 001, consisting of ~~two (2) fiberglass panel reciprocators, each equipped with~~ one (1) optimized spray or equivalent gel coat application system, ~~and~~ one (1) non-atomized or equivalent resin application system **with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system,** with dry filters for overspray **control,** and exhausting to **ten (10)**~~twelve (12)~~ stacks designated as SV-36 through SV-**45**~~47~~. (Constructed in 1998 **and modified in 2004**)

(c) One (1) fiberglass panel manufacturing line, identified as the "C" line and Unit 003, consisting of two (2) optimized spray or equivalent gel coat application systems, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through five (5) stacks designated as CEX1-CEX5, with dry filters for overspray. (Constructed in 2000 and modified in 2003)

(d) One (1) Lauan woodworking station for lines A, B, and C, identified as Unit 002, with a maximum raw material input rate of ~~265~~ **5,063** pounds per hour, consisting of one (1) wide belt sander, one (1) table saw, one (1) chop saw, and one (1) panel saw, all controlled by one (1) Honeyville baghouse, exhausting to stack S002. (Constructed in 1988)

(e) One (1) standby woodworking shop equipment for lines A, B, and C, identified as Unit 004, with a maximum throughput rate of ~~265~~ **5,063** pounds of raw material per hour, consisting of one (1) wide belt sander, controlled by one (1) Torit cyclone/dust collector exhausting to stack S004. (Constructed in 1998 and 2000)

(f) One (1) panel grinding/trimming station for lines A and B, identified as Unit 005, with a maximum raw material input rate of ~~1,411~~ **11,050** lb/hr, consisting of **the following (constructed in 1988 and modified in 1998 and 2004):**

(1) **One (1) trimming operation, including** one (1) CNC panel saw, two (2) hand saws, and **one (1) vertical saw,** ~~four (4) hand grinders~~, controlled by one (1) baghouse (CDC1), exhausting to stack S005. ~~(Constructed in 1988 and 1998)~~

(2) **One (1) grinding operation, including four (4) hand grinders, each controlled by a high efficiency dust collector and/or baghouse CDC1.**

(g) One (1) panel CNC saw for line C, identified as Unit 006, with a maximum throughput rate of ~~627~~ **5,525** pounds of raw material per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, exhausting to stack S006. (Constructed in 2000)

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of ~~627~~ **5,525** pounds per hour, controlled by ~~one (1) RUWAC portable drum dust collector, one (1) UAS dust collector (Dust Hog), and~~ one (1) UAS interior baghouse **and one (1) exterior baghouse**, exhausting to stack S006. **This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors.** (Constructed in 2000)

(i) One (1) vertical saw for Line C, identified as 008, with a maximum throughput rate of ~~627~~ **5,525** pounds of raw materials per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, and exhausting to stack S006. (Constructed in 2002)

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) fiberglass panel manufacturing line, identified as the "A" line and Unit 001, consisting of ~~three (3) fiberglass panel reciprocators, each equipped with~~ one (1) optimized spray or equivalent gel coat application system**,** ~~and~~ one (1) non-atomized or equivalent resin application system **with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system,** with dry filters for overspray **control,** and exhausting at eleven (11) stacks, identified as SV-25 through SV-35**.** ~~Only two (2) of the three (3) reciprocators may be operated simultaneously, with the third reciprocator used as a back-up.~~ (Constructed in 1987**, and modified in 2004**)

(b) One (1) fiberglass panel manufacturing line, identified as the "B" line and Unit 001, consisting of ~~two (2) fiberglass panel reciprocators, each equipped with~~ one (1) optimized spray or equivalent gel coat application system**,** ~~and~~ one (1) non-atomized or equivalent resin application system **with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system,** with dry filters for overspray **control,** ~~and~~ exhausting to ~~twelve (12)~~**ten(10)** stacks designated as SV-36 through SV-~~47~~**45**. (Constructed in 1998 **and modified in 2004**)

(c) One (1) fiberglass panel manufacturing line, identified as the "C" line and Unit 003, consisting of two (2) optimized spray or equivalent gel coat application systems, one (1) non-atomized or equivalent resin application system with covered cure, and one (1) Vacuum Infusion Process (VIP) resin application system, exhausting through five (5) stacks designated as CEX1-CEX5, with dry filters for overspray. (Constructed in 2000 and modified in 2003)

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

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 8-1-6] **[326 IAC 2-2][326 IAC 2-1.1-5]**

~~(a) Pursuant to the MACT determination under 326 IAC 4.1-1 and CP No. 039-9288-00002, issued on August 6, 1998, the operating conditions for the fiberglass panel manufacturing line, identified as the "B" line, shall be the following:~~

~~(1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats from lines "A" and "B" shall be limited to less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (PSD Rules) do not apply. The VOC usage limit for line "B" is required as a component of the MACT determination and compliance with this limit shall be determined based upon the following criteria:~~

~~(A) 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 HAP 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.~~

~~(B) 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: "Unified Emission Factors for Open Molding of Composites, July~~

~~23, 2001". The emission factors used for monomers that is styrene 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 or methyl methacrylate shall be considered as styrene on an equivalent weight basis.~~

~~(2) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of thirty six percent (36%) by weight for resins and thirty five percent (35%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis. i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.~~

~~(3) Overhead mechanized spray reciprocators shall be used to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAQ. The spray gun type shall be high volume low pressure (HVLP) or equivalent. HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

~~(4) Minimizing the period of roll-out and placement of wood reinforcing panels immediately after the last resin application.~~

~~(b) Pursuant to the MACT determination under 326 IAC 4.1-1 and 326 IAC 8-1-6 (BACT), the operating conditions for the fiberglass panel manufacturing line, identified as the "C" line, shall be the following:~~

Pursuant to the 326 IAC 4.1-1 (MACT) and 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following requirements for the fiberglass panel manufacturing lines A, B, and C:

(a) Pursuant to CP #039-9228-00002, issued on August 6, 1998, use of resins and gel coats in lines A and B shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This also makes the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to the modification in 2004.

(~~1~~**b**) **Pursuant to SSM #039-17785-00002, issued on November 5, 2003,** ~~U~~**u**se of resins and gel coats ~~that contain styrene~~ **in line C** shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 129.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. **This limit ensures the net VOC increase is less than 40 tons/yr for the modification in 2003 and makes the requirements of 326 IAC 2-2 (PSD) not applicable.** ~~Compliance with this limit shall be determined based upon the following criteria:~~

(c) Compliance with the emission limits in (a) and (b) of this condition shall be determined based upon the following criteria:

(~~A~~**1**) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is

appropriate for the HAP monomer content, method of application, and other emission reduction techniques used 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.

(~~B~~**2**) The emission factors approved for use by IDEM, OAQ for open molding processes shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001. The emission factor for the VIP application system (closed molding) is 1% by weight of the HAP monomer content, which is provided by the American Composites Manufacturers Association (ACMA). For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(~~C~~**d**) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Open Molding Production 1 Gel Coat	36
Open Molding Production Resin	35
VIP Production Resin	40

[1]Production refers to the manufacture of parts.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

(~~D~~**e**) Non-atomized spray or equivalent application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(~~E~~**f**) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(~~e~~**g**) The listed work practices shall be followed for the fiberglass panel manufacturing lines "A", "B", and "C":

. . . . .

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

~~(a)~~ Pursuant to ~~CP No. 039-4937-00002, issued on March 21, 1996 and~~ 40 CFR 52, Subpart P, the particulate matter (PM) from **each of** the fiberglass panel manufacturing line**s A, B, and C** ~~identified as the "A" line,~~ shall be limited by the following:

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

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

~~(b) Pursuant to CP No.039-9288-00002, issued on August 6, 1998 and 40 CFR 52, Subpart P, the fiberglass panel manufacturing line, identified as the "B" line, shall be limited by the following:~~

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

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

~~Where the allowable PM emission rate from the fiberglass panel manufacturing line, identified as the "B" line shall not exceed 1.88 pounds per hour.~~

~~(c) Pursuant to SPM No.039-12284-00002, issued on October 13, 2000 and 40 CFR 62, Subpart P, the particulate matter emissions from the fiberglass panel manufacturing line. identified as the "C" line. shall not exceed 4.08 lb/hr based on the following equation:~~

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

~~D.1.10 Visible Emissions Notations~~

~~(a) Weekly visible emission notations of all exhaust to the atmosphere from the line "A", line "B", and line "C" fiberglass panel manufacturing lines' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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 batch or 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

D.1.~~11~~**10** Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, when the lines are in operation. **To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks 25 through 45, and stacks CEX1 through CEX5 while one or more of the spray applicators are in operation.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a ~~violation of~~ **deviation from** this permit.

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

. . . .

D.1.~~12~~**11** Record Keeping Requirements

. . . . .

(b) To document compliance with Condition D.1.~~11~~**10**, the Permitted shall maintain a log of **weekly overspray observations,** daily and ~~weekly~~ **monthly** inspections ~~of the filters~~, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(c) To document compliance with Condition D.1.10, the Permittee shall maintain records of weekly visible emission notations of the spray applicators' stack exhausts.~~

(~~d~~**c**) To document compliance with Condition D.1.4, the Permittee shall maintain the following training records:

. . . . .

D.1.~~13~~**12** Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(d) One (1) Lauan woodworking station for lines A, B, and C, identified as Unit 002, with a maximum raw material input rate of ~~265~~ **5,063** pounds per hour, consisting of one (1) wide belt sander, one (1) table saw, one (1) chop saw, and one (1) panel saw, all controlled by one (1) Honeyville baghouse, exhausting to stack S002. (Constructed in 1988)

(e) One (1) standby woodworking shop equipment for lines A, B, and C, identified as Unit 004, with a maximum throughput rate of ~~265~~ **5,063** pounds of raw material per hour, consisting of one (1) wide belt sander, controlled by one (1) Torit cyclone/dust collector exhausting to stack S004. (Constructed in 1998 and 2000)

(f) One (1) panel grinding/trimming station for lines A and B, identified as Unit 005, with a maximum raw material input rate of ~~1,411~~ **11,050** lb/hr, consisting of **the following (constructed in 1988 and modified in 1998 and 2004):**

(1) **One (1) trimming operation, including** one (1) CNC panel saw, two (2) hand saws, and **one (1) vertical saw,** ~~four (4) hand grinders~~, controlled by one (1) baghouse (CDC1), exhausting to stack S005. ~~(Constructed in 1988 and 1998)~~

(2) **One (1) grinding operation, including four (4) hand grinders, each controlled by a high efficiency dust collector and/or baghouse CDC1.**

(g) One (1) panel CNC saw for line C, identified as Unit 006, with a maximum throughput rate of ~~627~~ **5,525** pounds of raw material per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, exhausting to stack S006. (Constructed in 2000)

(h) Two (2) panel grinding machines for line C, identified as Unit 007, each with a maximum raw material input rate of ~~627~~ **5,525** pounds per hour, controlled by ~~one (1) RUWAC portable drum dust collector, one (1) UAS dust collector (Dust Hog), and~~ one (1) UAS interior baghouse **and one (1) exterior baghouse**, exhausting to stack S006. **This unit may also controlled by additional high efficiency dust collectors or portable drum dust collectors.** (Constructed in 2000)

(i) One (1) vertical saw for Line C, identified as 008, with a maximum throughput rate of ~~627~~ **5,525** pounds of raw materials per hour, controlled by one (1) UAS dust collector (Dust Hog) and one (1) UAS interior baghouse, and exhausting to stack S006. (Constructed in 2002)

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

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

Particulate emissions from the operations 002, 004, 005, 006, 007 and 008 shall be limited to the emission limits listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
002	~~265~~ **5,063**	~~1.06~~ **7.64**
004	~~265~~ **5,063**	~~1.06~~ **7.64**
005	~~1,411~~ **11,050**	~~3.25~~ **12.9**
006	~~627~~ **5,525**	~~1.89~~ **8.10**

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
007	~~627~~ **5,525**	~~1.89~~ **8.10**
008	~~627~~ **5,525**	~~1.89~~ **8.10**

. . . . .

D.2.2 PSD Minor ~~Modification~~ Limits [326 IAC 2-2]

(a) ~~Pursuant to~~ **In order to make the requirements of** 326 IAC 2-2 (PSD) **not applicable**, the PM and PM10 emissions from operations 002, 004, 006, 007, and 008 shall not exceed the emissions limits listed in the table below:

Unit ID	PM10 Emission Limit (lbs/hr)	PM Emission Limit (lbs/hr)
002	0.21	0.42
004	0.92	1.80
006, 007, and 008	1.14	2.24

This is equivalent to 9.94 tons/yr of PM10 emissions and 19.5 tons/yr of PM emissions. Combined with the PM/PM10 emissions from fiberglass panel manufacturing line C (003), the particulate emissions from ~~this~~ Significant Source Modification #039-17785-00002~~,~~ are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

(b) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(1) The PM/PM10 emissions from the trimming operations after control shall not exceed 2.84 x 10^{-4} lbs/ft^2.

(2) The PM/PM10 emissions from the grinding operations after control shall not exceed 3.70 x 10^{-3} lbs/ft^2.

(3) The total fiberglass panel input to Unit 005 shall be limited to less than 1,750,000 square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to 34.9 tons/yr of PM/PM10 emissions from Unit 005. Combined with the PM/PM10 emission increase from fiberglass panel manufacturing lines A and B, the particulate emission increases from SSM #039-18680-00002 are limited less than 15 tons/yr for PM10 and less than 25 tons/yr for PM.

D.2.5 Visible Emissions Notations

. . . .

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Response Plan shall be considered a deviation from this permit.**

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses and dust collectors used in conjunction with the woodworking and finishing operations 002, 004, 005, 006, 007, and 008, at least once a week when these woodworking and finishing operations are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for anyone reading. **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 - Compliance Response Plan shall be considered a deviation from this permit.**

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. **Failure to take response steps in accordance with Section C - Compliance Response Plan, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.** ~~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 single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then** failed units and the associated process will be shut down immediately until the failed units have 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).

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.2(b)(3), the Permittee shall maintain monthly records of the total surface area of the fiberglass panels input to Unit 005.

(~~a~~**b**) To document compliance with Condition D.2.5, the Permittee shall maintain daily visible emission notations of the woodworking stations stack exhaust.

(~~b~~**c**) To document compliance with Condition D.2.6, the Permittee shall maintain the weekly records of the total static pressure drop during normal operation when venting to the atmosphere.

(~~c~~**d**) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

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

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2(b)(3) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: Owens Corning Fabricating Solutions
Source Address: 16710 Maple Drive, Goshen, Indiana 46526
Mailing Address: 16710 Maple Drive, Goshen, Indiana 46526
Part 70 Permit No.: 039-6091-00002
Facility: Unit 005
Parameter: Total surface area of the fiberglass panels processed
Limit: Less than 1,750,000 square feet per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

9 No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Source Modification No. 039-18680-00002. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-18917-00002.

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
HAPs Emissions
From Fiberglass Panel Manufacturing Lines A and B (#001)

Company Name: Owens Corning Fabricating Solutions
Address: 16710 Maple City Dr., Goshen, IN 46526
SPM: 039-18917-00002
Reviewer: ERG/YC
Date: June 15, 2004

Application Method	Coatings	Density (lbs/hr)	Max. Production Rate (unit/hr)	Max. Coating Usage (gal/unit)	Maximum Usage (lbs/hr)	Weight % Styrene	*Emission Factor for Styrene (lbs/ton)	PTE of Styrene (tons/yr)	Weight % MMA	*Emission Factor for MMA (lbs/ton)	PTE of MMA (tons/yr)	Weight % MEK	**Emission Factor for MEK (lbs/ton)	PTE of MEK (tons/yr)
Gelcoat Controlled Spray Application with Covered Cure (without roll-out)	Gel Coat	10.25	9.00	5.10	470	36.0%	143	147	4.0%	60	61.8	0.0%	0	0.00
VIP with Covered Cure (without roll-out)	Resin	9.25	9.00	11.9	991	35.0%	20.0	43.4	0.0%	0	0.00	0.0%	0	0.00
	Catalyst	9.75	8.41	0.21	16.8	0.0%	0	0.0	0.0%	0	0.00	1.0%	20	0.74
Total								**191**			**61.8**			**0.74**

* Styrene emission factor for gel coat is based on "Unified Emission Factors for Opening Molding of Composites" (Jul 23, 2001) and the unit is pounds of HAP per ton resin/gel coat processed.
Styrene emission factor for VIP application method is the emission factor for closed molding process from the website of American Composites Manufacturers Association (ACMA).
**The emission factor for MEK = 2000 lb/ton x Weight % MEK (Assume all the MEK contained in the catalyst evaporates).

Total Potential to Emit HAPs = 253 tons/yr

METHODOLOGY

Potential to Emit HAPs (tons/yr) = Max. Usage (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs x Emission Factor (lb/ton) x 1 tons/2000 lbs

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
VOC and PM/PM10 Emissions
From Fiberglass Panel Manufacturing Lines A and B (#001)

Company Name: Owens Corning Fabricating Solutions
Address: 16710 Maple City Dr., Goshen, IN 46526
SPM: 039-18917-00002
Reviewer: ERG/YC
Date: June 15, 2004

Application Method	Coatings	Density (lbs/gal)	Weight % VOC	Max. Production Rate (unit/hr)	Max. Coating Usage (gal/unit)	Maximum Usage (lbs/hr)	*VOC Emission Factor (lbs/ton)	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	**PTE of PM/PM10 before Control (lbs/hr)	**PTE of PM/PM10 before Control (tons/yr)	***Transfer Efficiency	****PM/PM10 Control Efficiency	PTE of PM/P10 after Control (lbs/hr)	PTE of PM/P10 after Control (tons/yr)
Gelcoat Controlled Spray Application with Covered Cure (without roll-out)	Gel Coat	10.25	40.0%	9.00	5.10	470	203	47.8	1146	209	2.82	12.4	99%	76%	0.68	2.97
VIP with Covered Cure (without roll-out)	Resin	9.25	35.0%	9.00	11.9	991	20.0	9.9	238	43.4	6.44	28.2	99%	76%	1.55	6.77
	Catalyst	9.75	1.00%	8.41	0.21	16.8	20.0	0.17	4.03	0.74	0.00	0.00	100%	0%	0.00	0.00
Total										**253**		**40.6**				**9.74**

* The emission factors for gel coat and resin are the sum of the emission factors for styrene and MMA in page 1 of TSD Appendix A.
The VOC emission factor for catalyst = 2000 lb/ton x Weight % VOC (assume that all the VOCs contained in the catalyst evaporate).
** Assume all the PM emissions equal PM10 emissions.
*** The transfer efficiency and control efficiency are from the "Draft Guide to the Estimation and Permitting of PM from the Manufacture of Reinforced Plastic Composites" by CFA in August, 2001.
**** The PM control efficiency includes 85% capture efficiency and 95% control efficiency for dry filters.

METHODOLOGY

Max. Usage (lbs/hr) = Max. Production Rate (unit/hr) x Max. Coating Usage (gal/unit) x Density (lbs/gal)
PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)
PTE of VOC (lbs/day) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 24 hr/day
PTE of VOC (tons/yr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM/PM10 before Control (lbs/hr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency)
PTE of PM/PM10 before Control (tons/yr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency) x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM/PM10 after Control (lbs/hr) = PTE of PM/PM10 before Control (lbs/hr) x (1 - Control Efficiency)
PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (lbs/hr) x (1 - Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Actual PM10 and PM10 Emissions
From the Panel Grinding/Trimming Operations (005)

Company Name: Owens Corning Fabricating Solutions
Address: 16710 Maple City Dr., Goshen, IN 46526
SPM: 039-18917-00002
Reviewer: ERG/YC
Date: June 15, 2004

Process	*PM/PM10 Emission Factor (lbs/ft^2)	Max. Throughput Rate (ft^2/hr)	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 after Control (lbs/hr)	Annual Throughput Limit (ft^2/yr)	Limited PTE of PM/PM10 after Control (tons/yr)
Trimming	6.37E-03	3,240	20.6	90.4	95.54%	0.92	17,500,000	2.49
Grinding	8.30E-02	3,240	269	1,178	95.54%	12.0	17,500,000	32.4
Total				**1,268**				**34.9**

* This is provided by the source based on the density of the panel and cutting length for each panel. The emissions from the new vertical saw has been included also.

Methodology

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput Rate (ft^2/hr) x Emission Factor (lbs/ft^2)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput Rate (ft^2/hr) x Emission Factor (lbs/ft^2) x 8760 hrs/yr x 1 ton/2000 lbs
PTE of PM/PM10 after Control (lbs/hr) = Max. Throughput Rate (ft^2/hr) x Emission Factor (lbs/ft^2) x (1-Control Efficiency)
Limited PTE of PM/PM10 after Control (tons/yr) = Limited Throughput Rate (ft^2/yr) x Emission Factor (lbs/ft^2) x 1 ton/2000 lbs x (1-Control Efficiency)

Appendix A: Emission Calculations
Actual PM10 and PM10 Emissions
From the Panel Grinding/Trimming Operations (005)

Company Name: Owens Corning Fabricating Solutions
Address: 16710 Maple City Dr., Goshen, IN 46526
SPM: 039-18917-00002
Reviewer: ERG/YC
Date: June 15, 2004

Process	*PM/PM10 Emission Factor (lbs/ft^2)	Actual Throughput Rate in 2002 (ft^2/yr)	Actual Throughput Rate in 2003 (ft^2/yr)	Control Efficiency (%)	Actual PM/PM10 Emission in 2002 (tons/yr)	Actual PM/PM10 Emission in 2003 (tons/yr)	Averaged Actual PM/PM10 Emissions (tons/yr)
Trimming	3.18E-03	12,419,992	11,181,414	95.54%	0.88	0.79	0.84
Grinding	8.30E-02	12,419,992	11,181,414	95.54%	23.0	20.7	21.8
Total							**22.7**

* This is provided by the source based on the density of the panel and cutting length for each panel.

Methodology

Actual Emissions (tons/yr) = Actual Throughput Rate (ft^2/yr) x Emission Factor (lbs/ft^2) x 1 ton/2000 lbs
Averaged Actual Emissions = [Actual Emissions in 2002 (tons/yr) + Actual Emissions (tons/yr)]/2