



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 15, 2004

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

TO: Interested Parties / Applicant
RE: Alpha Systems, Inc / 039-19510-00504
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.

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 impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

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

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

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

October 15, 2004

David V. Smith, Jr.
Alpha Systems, Inc.
5120 Beck Drive
Elkhart, Indiana 46516

Re: 039-19510-00504
First Minor Permit Modification to:
Part 70 Permit No.: 039-12831-00504

Dear Mr. Smith:

Alpha Systems, Inc., was issued a permit on March 22, 2002, for a adhesive, fiberglass sink, counter top, and adhesive production operation. A letter requesting changes to this permit was received on June 24, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Specifically, Alpha Systems, Inc. submitted an application to add one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer.

The proposed hot melt adhesive production process is an independent batch process which requires approximately 8 hours to complete. Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed mixing process.

The emissions generated by the proposed process are PM and PM10 emissions generated by manually introducing calcium carbonate and talc filler into the adhesive mix. The unrestricted potential PM and PM10 emissions are estimated to be 2.68 tons/yr and 2.68 tons/yr which are less than the 326 IAC 2-7-10.5(d)(4)(A) Minor Source Modification low end applicable level of 5 tons/yr.

Therefore, the source is not required to obtain a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d) or a Significant Source Modification pursuant to 326 IAC 2-7-10.5(f).

Adding the proposed mixing process will trigger one new applicable requirement, 326 IAC 6-3-2, but no changes to any existing conditions are required.

Since there is a new applicable requirement, the proposed changes cannot be incorporated into the permit via an administrative amendment because the only viable option under the administrative amendment requirements (326 IAC 2-7-11(a)(7)) does not allow changes with new applicable requirements.

However, the proposed modification does meet all of the minor permit modification requirements under 326 IAC 2-7-12(b)(1).

Therefore, the proposed changes shall be incorporated into the permit via a Minor Permit Modification pursuant to 326 IAC 2-7-12(b)(1) which states that the minor permit modifications may be used only for those permit modifications that

- (a) do not violate any applicable requirements,
- (b) do not involve significant changes to existing monitoring, reporting, or record keeping requirements,
- (c) do not require or change a case by case limit or standard determination, source specific determination for temporary source of ambient impacts, or visibility or increment analysis,
- (d) do not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement to which the source would otherwise be subject,
- (e) are not modifications under any provision of Title I of the CCA, and
- (f) are not required by the art 70 program to be processed as a significant modification.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

All other conditions of the permit shall remain unchanged and in effect. The entire permit is enclosed.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

All questions should be directed to Scott Fulton, IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Scott Fulton, or extension 3-5691, or dial (317) 233-5691.

Sincerely,

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

Attachments

SDF

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Sarah Cloe
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Alpha Systems, Inc.
5100 Beck Drive,
5120 Beck Drive, and
21680 Protecta Drive
Elkhart, Indiana 46516**

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

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

Operation Permit No.: T039-12831-00504	Date Issued: March 22, 2002 Expiration Date: March 22, 2007
Issued by: Janet G. McCabe, Assistant Commissioner, Office of Air Quality	

First Administrative Amendment No.:	039-16257-00504	Date Issued:	September 12, 2002
First Significant Permit Modification No.:	039-16284-00504	Date Issued:	May 13, 2003

First Minor Permit Modification No.: 039-19510-00504	Affected Pages: 2 - 7, 17, 25, and 26
Issued by: Original Signed by Paul Dubenetzky Branch Chief, Office of Air Quality	October 15, 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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates two (2) plants on Beck Drive which manufacture adhesives, fiberglass counter tops, and sinks, and one (1) plant on Protecta Drive Plant which manufactures fiberglass molds and plastic/vacuum formed items.

Responsible Official:	David V. Smith, Jr.
Source Address:	5100 Beck Drive, Elkhart, Indiana 46516 5120 Beck Drive, Elkhart, Indiana 46516 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address:	5120 Beck Drive, Elkhart, Indiana 46516
SIC Code:	2189, 3088
County Location:	Elkhart
Source Location Status:	Attainment for PM, PM10, SO2, NOx, and CO Nonattainment for 8-hour ozone
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

This adhesive, sink and countertop manufacturing operation consists of three (3) plants:

- (a) Beck Drive Plant located at 5120 and 5100 Beck Drive, Elkhart, Indiana 46516; and
- (b) Protecta Drive Plant, located at 21680 Protecta Drive, Elkhart, Indiana 46516.

The three (3) plants are owned by one (1) company, located on the same property (contiguous or adjacent property) but have different SIC codes: The 5120 Beck Drive Plants manufactures adhesives, the 5100 Beck Drive plant manufactures counter tops, and sinks, used by the Recreational Vehicle industry, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed items, with an SIC code of 3088. This determination was previously made in Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000.

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

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

5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designated as M-1, maximum capacity of 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designated as M-2, maximum capacity of 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designated as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

5100 Beck Drive Building

- (d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.
- (e) One (1) flat sheet cast polymer line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1 and FS-2, one (1) two head and one (1) four head spec sheet belt sanders designated as FS-3 and FS-4 for finishing. This operation is capable of processing 3,000 pounds per hour of product.

One (1) 50,000 CFM pulse jet baghouse dust collection system, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility FS1 through FS-4.

- (f) One (1) sink/counter top cast polymer line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts can be conveyed to an 0.8 million Btu/hr (MMBTU/hr) natural gas-fired dryer, identified D1 for drying as a final product.
- (g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr venting inside the building.
- (h) One (1) 300 gallon mix tank, designed as MT-1, with a maximum capacity of 2,500 pounds per hour and venting inside the building.
- (i) Three (3) manual mixers, designed as MM-1, MM-2, and MM-3, with a maximum capacity of 430 lbs each and venting inside the building.
- (j) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.
- (k) One (1) Empire Blast Cabinet used to clean maintenance tools, vented to a dust collector designed as DC-2 and then internally.
- (l) Ten (10) hand grinders used for the final finish operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Protecta Drive Plant:

- (m) One (1) mold booth, designated as #1, with a maximum throughout of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.
- (n) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

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

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

- (a) One (1) woodworking and plastics machining area, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere. (326 IAC 6-3-2)
- (b) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks. (326 IAC 8-9)
- (c) One (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer

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

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

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

- (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.

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)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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

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 D.1 FACILITY OPERATION CONDITIONS

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

5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designated as M-1, maximum capacity of 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designated as M-2, maximum capacity of 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designated as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (d) One (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer

(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 VOC Limit [326 IAC 8-1-6] and Hazardous Air Pollutant (HAP) Limit [326 IAC 2-4.1]

- (a) The input of raw VOC and/or HAP containing material to the three (3) mix tanks designated as M-1 through M-3 shall not exceed 1,664 tons per consecutive twelve (12) month period, with compliance demonstrated at the end of each month. Each ton of VOC and/or HAP containing cleanup solvent used at the three (3) mix tanks designated as M-1 through M-3 shall be considered equivalent to 66.7 tons of raw materials input to the coating production process.
- (b) The maximum individual HAP content of any coating shall not exceed forty percent (40%), which will limit the potential to emit VOC and total HAPs from the three (3) mix tanks designated as M-1 through M-3 to less than 25 tons per year, and will limit the potential to emit each individual HAP to less than 10 tons per year. These limits are based on the AP-42 emission factor of 30 pounds of VOC per ton produced (AP-42, Chapter 6.4, Table 6.4-1). Therefore, the requirements of 326 IAC 2-4.1-1 (New Source toxics control) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

D.1.2 Particulate Matter Emission Limitations [326 IAC 6-3-2]

The allowable particulate emission rate from the Ross Model FDA-600 hot melt adhesives mixing process shall not exceed 1.58 pounds per hour when operating at a process weight rate of 489 pounds per hour.

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

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

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and HAP-containing material usage for the twelve (12) consecutive month period.

D.1.4 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.

- (1) The amount and VOC/HAP content of each coating produced and each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The volume weighted VOC/HAP content of the coatings produced for each month;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC/HAP input for each month; and
- (5) The weight of VOCs/HAPs emitted at the three (3) mixing tanks for each compliance period.

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

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Minor Permit Modification to an Existing Source Part 70 Permit

Source Background and Description

Source Name: Alpha Systems, Inc.
Source Location: 5100 Beck Drive, Elkhart, Indiana 46516
5120 Beck Drive, Elkhart, Indiana 46516
21680 Protecta Drive, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 2891
Part 70 Permit No.: 039-12831-00504
Date Issued: March 22, 2002
Minor Permit Modification No.: 039-19510-00504
Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed an application from Alpha Systems, Inc. relating to the operation of their existing adhesive, fiberglass sink, counter top, and adhesive production operation.

Request

Specifically, on June 24, 2004, Alpha Systems, Inc. submitted an application to add one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer.

The proposed hot melt adhesive production process is an independent batch process which requires approximately 8 hours to complete. Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed mixing process.

The emissions generated by the proposed process are PM and PM10 emissions generated by manually introducing calcium carbonate and talc filler into the adhesive mix. The unrestricted potential PM and PM10 emissions are estimated to be 2.68 tons/yr and 2.68 tons/yr which are less than the 326 IAC 2-7-10.5(d)(4)(A) Minor Source Modification low end applicable level of 5 tons/yr.

Therefore, the source is not required to obtain a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d) or a Significant Source Modification pursuant to 326 IAC 2-7-10.5(f).

Adding the proposed mixing process will trigger one new applicable requirement, 326 IAC 6-3-2, but no changes to any existing conditions are required.

Since there is a new applicable requirement, the proposed changes cannot be incorporated into the permit via an administrative amendment because the only viable option under the administrative amendment requirements (326 IAC 2-7-11(a)(7)) does not allow changes with new applicable requirements.

However, the proposed modification does meet all of the minor permit modification requirements under 326 IAC 2-7-12(b)(1).

Therefore, the proposed changes shall be incorporated into the permit via a Minor Permit Modification pursuant to 326 IAC 2-7-12(b)(1) which states that the minor permit modifications may be used only for those permit modifications that

- (a) do not violate any applicable requirements,
- (b) do not involve significant changes to existing monitoring, reporting, or record keeping requirements,
- (c) do not require or change a case by case limit or standard determination, source specific determination for temporary source of ambient impacts, or visibility or increment analysis,
- (d) do not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement to which the source would otherwise be subject,
- (e) are not modifications under any provision of Title I of the CCA, and
- (f) are not required by the art 70 program to be processed as a significant modification.

Existing Approvals

The source has been operating under Part 70 permit 039-12831-00504, issued on March 22, 2002, First Administrative Amendment 039-16257-00504, issued on September 12, 2002, and First Significant Permit Modification 039-16284-00504, issued on May 13, 2003.

Recommendation

The staff recommends to the Commissioner that the minor 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.

Emission Calculations

The proposed hot melt adhesive production process is an independent batch process which requires approximately 8 hours to complete. Therefore, the emissions generated by the proposed modification are the emissions generated by the proposed mixing process.

The following calculations determine the unrestricted potential emissions and the estimated emissions after controls.

Unrestricted Potential Emissions:

The emissions generated by the proposed process are PM and PM10 emissions generated by manually introducing calcium carbonate and talc filler into the adhesive mix.

No direct emission factors were available that could be used to determine the fill handling emissions. However, US EPA, AP-42, Chapter 6.1, Paint and Varnish Manufacturing, Section 6.4.1, states that particulate emissions due to the handling of dry paint pigments is approximately 0.5 to 1.0 percent of the pigment handled. The Office of Air Quality has determined that the handling of the fillers at the proposed process is similar to handling dry paint pigments. Therefore, the emission factor for PM/PM10 will be the worst case emission factor, or 0.01 lb PM/PM10 per lb filler.

The following calculations determine the unrestricted potential emissions based on a maximum filler usage rate of 489 pounds per batch, 8 hours per batch, 0.01 lb PM/PM10 per lb filler, emissions before controls, and 8760 hours of operation.

$$489 \text{ lb filler} / 8 \text{ hr} * 24 \text{ hr/day} * 365 \text{ day/yr} * 0.01 \text{ lb PM/PM10} / \text{lb filler} * 1/2000 \text{ ton PM/PM10} / \text{lb PM/PM10} = 2.68 \text{ tons PM/PM10/yr}$$

Emissions After Controls:

The proposed mixing process emissions are uncontrolled. Therefore, the emissions after controls are equal to the estimated emissions before controls.

Unrestricted Potential Emissions Due to the Proposed Changes

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE due to the proposed changes before controls, limits, and standards. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.68
PM ₁₀	2.68
SO ₂	-
VOC	-
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	-
Combined HAPs	-

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) The source after the proposed changes is still not a major PSD stationary source because the source VOC emissions are still less than the applicable major source level of 100 tons per year and all other criteria pollutant emissions are still less than their applicable major source level of 250 tons per year.
- (b) The source after the proposed changes is still a Title V major stationary source because the single and combined HAP emissions still exceed their respective applicable levels of 10 and 25 tons per year

Federal Rule Applicability

The proposed changes do not trigger any new applicable federal rules and do not affect any of the existing applicable federal requirements.

State Rule Applicability - Entire Source

The proposed changes do not trigger any new entire source state rules and do not affect any of the existing entire source state rules.

State Rule Applicability - Individual Facilities

The proposed changes do not affect any of the existing individual facility state rules. The only new individual facility state rule that may apply due to the proposed changes is 326 IAC 6-3-2.

326 IAC 6-3-2:

The proposed mixing process is subject to the requirements of 326 IAC 6-3-2(e), because the proposed mixing process is a manufacturing process, PM emissions are generated, and the proposed process is not one of the exemptions listed in 326 IAC 6-3-1(b).

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate for a process weight rate of 489 lb/hr (0.24 ton/hr) shall be 1.58 lb/hr.

$$E = 4.10 * [P]^{0.67} = 4.10 * [0.24]^{0.67} = 1.58 \text{ lb/hr}$$

where: E = allowable hourly PM rate (lb/hr)
P = process weight rate (tons/hr)

The hourly potential PM emissions are estimated to be 0.61 lb/hr which is less than the 326 IAC 6-3-2 allowable hourly rate of 1.58 lb/hr.

$$2.68 \text{ tons PM/yr} * 2000 \text{ lb PM/ton PM} * 1/8760 \text{ yr/hr} = 0.61 \text{ lb/hr}$$

Therefore, compliance with 326 IAC 6-3 is expected.

Changes to the Permit

To incorporate the proposed changes into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

1. Condition A.4:

Since the unrestricted potential PM and PM10 emissions are less than the 326 IAC 2-1.1-3(d)(1)(A) exempt level of 5 tons/yr, the proposed mixing tank is determined to be an insignificant activity pursuant to 326 IAC 2-7-1(21)(A).

Therefore, the proposed mixing process description shall be added to the insignificant activities list of Condition A.4.

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

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

- (a) One (1) woodworking and plastics machining area, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere. (326 IAC 6-3-2)
- (b) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks. (326 IAC 8-9)
- (c) **One (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer**

2. Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to include the proposed mixing process because the proposed process has an applicable requirement (326 IAC 6-3-2) and the proposed process will be located in the building at 5120 Beck Drive.

<p>Description [326 IAC 2-7-5(15)]:</p> <p>5120 Beck Drive Building</p> <p>(d) One (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer</p> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>
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3. New Condition D.1.2:

A new condition (Condition D.1.2) shall be added to include the new 326 IAC 6-3-2 requirements that apply to the proposed mixing process.

D.1.2 Particulate Matter Emission Limitations [326 IAC 6-3-2]

The allowable particulate emission rate from the Ross Model FDA-600 hot melt adhesives mixing process shall not exceed 1.58 pounds per hour when operating at a process weight rate of 489 pounds per hour.

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

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

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

All subsequent conditions shall be renumbered accordingly and the Table of Contents shall be adjusted top reflect the new condition.

Conclusion

The owner or operator shall operate the proposed mixing process according to the requirements specified in First Minor Permit Modification 039-19510-00504 and all other existing active source approvals.