INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
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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

August 19, 2004

TO: Interested Parties / Applicant

RE: Meridian Automotive Systems, Inc. / MSM 003-19600-00059

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 approval 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) calendar 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.

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

Enclosures
FNPER-MOD.dot 9/16/03

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August 19, 2004

Mr. Rod Swann
Meridian Automotive Systems, Inc.
13811 Roth Road
Grabill, Indiana 46741

Re: **003-19600-00059**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 003-5942-00059**

Dear Mr. Swann:

Meridian Automotive Systems, Inc. was issued Part 70 Operating Permit T 003-5942-00059 on March 26, 2002 for a high-pressure fiberglass-reinforced plastics manufacturing and painting source. An application to modify the source was received on June 25, 2004. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) SMC machine, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour.

(b) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

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.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments
EAL/MES
cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector - Patrick Burton
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner

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MINOR SOURCE MODIFICATION
PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Meridian Automotive Systems, Inc.
14123 Roth Road
Grabill, Indiana 46741-0189

(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.

First Minor Source Modification No.: 003-19600-00059	Sections Affected: A.1, A.2, D.1, D.2
Issued by: Original signed by Janet McCabe for Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2004

TABLE OF CONTENTS

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

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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official:	General Manager
Source Address:	14123 Roth Road, Grabill, Indiana 46741
Mailing Address:	14123 Roth Road, Grabill, Indiana 46741
General Source Phone Number:	219-627-3612
SIC Code:	3089
County Location:	Allen
Source Location Status:	Basic Nonattainment for 8-hour ozone Attainment for all remaining criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under nonattainment area rules; Major Source, Section 112 of the Clean Air Act

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

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

Painting Operations

(a) One (1) prime spray booth, known as SB-A, equipped with HVLP spray applicators or with equivalent or better spray applicators and dry filters for overspray control, installed in September 1993 and modified in May 2003, exhausted through stack G, capacity: 13.9 gallons of paint per hour.

(b) One (1) spray booth, known as SB-B, equipped with air atomization spray guns and dry filters for overspray control, installed in June 1973, exhausted through stacks I , J, and K, capacity: 10 gallons of paint per hour.

(c) One (1) spray booth, known as SB-C24, equipped with electrostatic spray guns and dry filters for overspray control, installed in 1982, exhausted through stacks D and E, capacity: 3 gallons of paint per hour.

(d) One (1) spray booth, known as SB-C32, equipped with electrostatic spray guns and dry filters for overspray control, installed in 1982, exhausted through stacks B and C, capacity: 4 gallons of paint per hour.

(e) One (1) prime touch up, known as TU-A, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack H, maximum capacity: 0.25 gallons of paint per hour.

(f) One (1) prime touch up, known as TU-B, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack L, maximum capacity: 0.25 gallons of paint per hour.

(g) One (1) touch up, known as TU-FNSH, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack P, capacity: 1 gallon of paint per hour.

Compounding and Reinforced Molding Operations

(h) Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, with a capacity of 12,000 pounds of SMC per hour, each, and one (1) SMC manufacturing line, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour, consisting of:

(1) sixteen (16) resin storage tanks, with storage capacities between 2,000 and 6,300 gallons, each,

(2) one (1) small add material handling area,

(3) one (1) SMC mix room, consisting of four (4) mixing tanks, seven (7) holding tanks, and six (6) dynamic mixers,

(4) three (3) SMC machines,

(5) one (1) SMC maturation area, and

(6) one (1) dust collection system, exhausted to Stack SV-01.

(i) One (1) Hannifan 200 ton reinforced plastic molding press, known as PR-0206, installed in 1975, capacity: 141 pounds of fiberglass reinforced plastic parts per hour.

(j) One (1) Hannifan 200 ton reinforced plastic molding press, known as PR-0213, installed in 1976, capacity: 141 pounds of fiberglass reinforced plastic parts per hour.

(k) One (1) Erie 400 ton reinforced plastic molding press, known as PR-0419, installed in 1969 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(l) One (1) Erie 400 ton reinforced plastic molding press, known as PR-0420, installed in 1969 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(m) One (1) Drake 600 ton reinforced plastic molding press, known as PR-0617, installed in 1968, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(n) One (1) Erie 600 ton reinforced plastic molding press, known as PR-0618, installed in 1968 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(o) One (1) W-W-M 1200 ton vacuum assisted reinforced plastic molding press, known as PRV-1222, installed in 1973, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(p) One (1) W-W-M 1200 ton vacuum assisted reinforced plastic molding press, known as PRV-1223, installed in 1973, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(q) One (1) W-W-M 1200 ton reinforced plastic molding press, known as PRV-1250, installed in 1978 and rebuilt in 1985, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(r) One (1) Erie 1500 ton vacuum assisted reinforced plastic molding press, known as PRV-1558, installed in 1977, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(s) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2024, installed in 1975, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(t) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2025, installed in 1975, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(u) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2059, installed in 1984, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(v) One (1) 2500 ton reinforced plastic molding press, known as PR-2566, installed in 2000, capacity: 435 pounds of fiberglass reinforced plastic parts per hour. This press was previously known as PRV-2572.

(w) One (1) 2500 ton reinforced plastic molding press, known as PR-2567, installed in 2000, capacity: 435 pounds of fiberglass reinforced plastic parts per hour. This press was previously known as PRV-2573.

(x) One (1) W-W-M 4400 ton vacuum assisted reinforced plastic molding press, known as PRV-4470, installed in 1995, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(y) One (1) boiler, known as BLR-B, firing natural gas as primary fuel and propane or diesel fuel as backup, installed in 1974, rated at 8.4 million British thermal units per hour.

(z) One (1) boiler, known as BLR-A, firing natural gas as primary fuel and propane or diesel fuel as backup, installed in 2000, exhausted through stack M, rated at: 16.7 million British thermal units per hour.

(aa) One (1) French 600 ton vacuum assisted reinforced plastic molding press, known as PRV-0648, installed in 1978 and rebuilt in 1990, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(bb) One (1) French 800 ton vacuum assisted reinforced plastic molding press, known as PR-0849, installed in 1978 and rebuilt in 1990, capacity: 188 pounds of fiberglass reinforced plastic parts per hour.

(cc) One (1) EEMCO 1,000 ton vacuum assisted reinforced plastic molding press, known as PRV-1026, installed in 1977 and rebuilt in 1990, capacity: 275 pounds of fiberglass reinforced plastic parts per hour.

(dd) One (1) HPM Corporation Injection Molding Press, known as PR-1571, installed in 1998, capacity: 188 pounds of fiberglass reinforced plastic parts per hour.

(ee) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

(ff) One (1) fiberglass reinforced composites touch up spray booth, known as TU-SPLASH, equipped with air atomization spray guns and dry filters for overspray control, exhausted

Facility Description [326 IAC 2-7-5(15)]: Painting and Compounding Operations

(a) One (1) prime spray booth, known as SB-A, equipped with HVLP spray applicators or with equivalent or better spray applicators and dry filters for overspray control, installed in September 1993 and modified in May 2003, exhausted through stack G, capacity: 13.9 gallons of paint per hour.

(b) One (1) spray booth, known as SB-B, equipped with air atomization spray guns and dry filters for overspray control, installed in June 1973, exhausted through stacks I , J, and K, capacity: 10 gallons of paint per hour.

(c) One (1) spray booth, known as SB-C24, equipped with electrostatic spray guns and dry filters for overspray control, installed in 1982, exhausted through stacks D and E, capacity: 3 gallons of paint per hour.

(d) One (1) spray booth, known as SB-C32, equipped with electrostatic spray guns and dry filters for overspray control, installed in 1982, exhausted through stacks B and C, capacity: 4 gallons of paint per hour.

(e) One (1) prime touch up, known as TU-A, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack H, maximum capacity: 0.25 gallons of paint per hour.

(f) One (1) prime touch up, known as TU-B, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack L, maximum capacity: 0.25 gallons of paint per hour.

(g) One (1) touch up, known as TU-FNSH, equipped with air atomization spray guns and dry filters for overspray control, installed prior to 1980, exhausted through stack P, capacity: 1 gallon of paint per hour.

(h) Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, with a capacity of 12,000 pounds of SMC per hour, each, and one (1) SMC manufacturing line, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour, consisting of:

(1) sixteen (16) resin storage tanks, with storage capacities between 2,000 and 6,300 gallons, each,

(2) one (1) small add material handling area,

(3) one (1) SMC mix room, consisting of four (4) mixing tanks, seven (7) holding tanks, and six (6) dynamic mixers,

(4) three (3) SMC machines,

(5) one (1) SMC maturation area, and

(6) one (1) dust collection system, exhausted to Stack SV-01.

(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 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to CP 003-3105-00059, issued on September 7, 1993, Best Available Control Technology (BACT) for the one (1) prime spray booth, identified as SB-A, has been determined to be:

(1) The method of application shall be performed with high-volume-low pressure (HVLP) spray applicators;

(2) The use of lower VOC paints (less than 3.5 lb VOC per gallon of coating excluding water).

(b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the two (2) spray booths, identified as SB-C24 and SB-C32, has been determined to be:

(1) The VOC input delivered to the applicators including cleanup solvents shall be limited to a total of no more than sixty-six (66) tons per twelve (12) consecutive month period;

(2) The method of application at the spray booths shall be done with electrostatic applicators;

(3) The use of low (25-40%) and medium (41-50%) solids content coatings, and

(4) The following management and work practices shall apply:

(i) Operator training course.

(ii) Spray gun cleaning.

(iii) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.

(iv) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(v) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(vi) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The VOC applied to the applicators from the four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32), the four (4) touch-up booths (TU-A, TU-B ,TU-FNSH and TU-SPLASH), the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, the eighteen (18) Reinforced Plastic Molding Presses, installed between 1968 and 1998 (PR-0206, PR-0213, PR-0419, PR-0420, PR-0617, PR-0618, PRV-0648, PRV-0849, PRV-1026, PRV-1222, PRV -1223, PR-1250, PRV-1558, PRV-2024, PRV-2025, PRV-2059, PRV-4470, PR-1571), and the two (2) 2500 ton Reinforced Plastic Molding Presses, constructed in 2000 (PR-2566 and PR-2567) shall be limited such that the total VOC emissions are no more than 246.1 tons per twelve (12) consecutive month period.

The SMC closed molding operations performed by the eighteen (18) Reinforced Plastic Molding Presses shall use the standard US EPA AP-42 three percent (3.0%) VOC emission factor to determine compliance with the VOC emission limit.

(b) The VOC emission limit expressed in Condition D.1.2 (a) combined with the full potential to emit VOC from the two (2) boilers and the limited actual emissions not to exceed 3.23 tons per year from other insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Hazardous Air Pollutants [326 IAC 2-4.1-1]

(a) The input of SMC to the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, shall be limited such that the worst case potential to emit a single HAP (styrene) is less than ten (10) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month, to make the requirements of 326 IAC 2-4.1-1 not applicable.

(b) For the purposes of determining the throughput limit, the following HAP emission factors will be used for the processes located at the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2:

(1) Resin Storage Tanks: 0.059 lbs/ton of SMC produced.

(2) Mixing Station: 0.19 lbs/ton of SMC produced.

(3) SMC Machine: 0.30 lbs/ton of SMC produced.

(4) SMC Holding Area: 0.0018 lbs/ton SMC produced.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

(a) The input of SMC to the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, shall be limited such that the potential to emit VOC is less than twenty-five (25) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month, to make the requirements of 326 IAC 8-1-6 not applicable.

(b) For the purposes of determining the throughput limit, the following VOC emission factors will be used for the processes located at the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2:

(1) Resin Storage Tanks: 0.059 lbs/ton of SMC produced.

(2) Mixing Station: 0.19 lbs/ton of SMC produced.

(3) SMC Machine: 0.30 lbs/ton of SMC produced.

(4) SMC Holding Area: 0.0018 lbs/ton SMC produced.

(c) Any change or modification that would increase the potential to emit VOC from Machine 3 to twenty-five (25) tons per year or more shall require prior approval from IDEM, OAQ.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The PM from each spray booth (the one (1) prime spray booth, known as SB-A, the one (1) spray booth, known as SB-B, the one (1) spray booth, known as SB-C24, the one (1) spray booth, known as SB-C32, the one (1) prime touch up, known as TU-A, the one (1) prime touch up, known as TU-B, and the one (1) touch up, known as TU-FNSH) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from the three (3) SMC manufacturing lines, known as Machine 1, Machine 2 and Machine 3, shall not exceed 23.3 pounds per hour when operating at a total process weight rate of 26,670 pounds per hour.

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

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

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

D.1.6 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

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

D.1.7 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

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

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

(1) Open molding;

(2) Closed molding;

(3) Centrifugal casting;

(4) Continuous lamination;

(5) Polymer casting;

(6) Pultrusion;

(7) Sheet molding compound (SMC) manufacturing; and

(8) Bulk molding compound (BMC) manufacturing.

Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1, D.1.2, D.1.3, and D.1.4 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 for the painting operations, and the SMC usage and emission factors for the SMC operations and the SMC manufacturing lines.

D.1.10 VOC and HAPs Emissions

Compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.1.11 Particulate Matter (PM)

(a) The dry filters for PM control shall be in operation at all times when the four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32) and three (3) touch up booths (TU-A, TU-B and TU-FNSH) are in operation.

(b) The dust collection system for PM control shall be in operation at all times when the three (3) SMC manufacturing lines are in operation.

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks B, C, D, E, G, H, I, J, K, L, and P while one or more of the booths are in operation. The Compliance Response Plan shall be

followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.1.13 Visible Emissions Notations

(a) Visible emission notations of the three (3) SMC manufacturing lines stack exhaust shall be performed once per shift 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.14 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the three (3) SMC manufacturing lines, at least once per shift when the three (3) SMC manufacturing lines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 8.0 and 12.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.1.15 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the three (3) SMC manufacturing lines. All defective bags shall be replaced.

D.1.16 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.17 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2 and D.1.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCS emitted for each compliance period.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.3.

(1) The amount and HAP content of each resin and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total HAP usage for each month; and

(3) The weight of HAPs emitted for each compliance period.

(c) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the three (3) SMC manufacturing lines stack exhaust once per shift.

(e) To document compliance with Condition D.1.14, the Permittee shall maintain per shift records of the total static pressure drop during normal operation.

(f) To document compliance with Condition D.1.15, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15 and the dates the vents are redirected.

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

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.19 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.1.20 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

(b) The significant permit modification application shall be submitted no later than July 21, 2005.

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

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(i) One (1) Hannifan 200 ton reinforced plastic molding press, known as PR-0206, installed in 1975, capacity: 141 pounds of fiberglass reinforced plastic parts per hour.

(j) One (1) Hannifan 200 ton reinforced plastic molding press, known as PR-0213, installed in 1976, capacity: 141 pounds of fiberglass reinforced plastic parts per hour.

(k) One (1) Erie 400 ton reinforced plastic molding press, known as PR-0419, installed in 1969 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(l) One (1) Erie 400 ton reinforced plastic molding press, known as PR-0420, installed in 1969 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(m) One (1) Drake 600 ton reinforced plastic molding press, known as PR-0617, installed in 1968, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(n) One (1) Erie 600 ton reinforced plastic molding press, known as PR-0618, installed in 1968 and rebuilt in 1986, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(o) One (1) W-W-M 1200 ton vacuum assisted reinforced plastic molding press, known as PRV-1222, installed in 1973, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(p) One (1) W-W-M 1200 ton vacuum assisted reinforced plastic molding press, known as PRV-1223, installed in 1973, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(q) One (1) W-W-M 1200 ton reinforced plastic molding press, known as PRV-1250, installed in 1978 and rebuilt in 1985, capacity: 338 pounds of fiberglass reinforced plastic parts per hour.

(r) One (1) Erie 1500 ton vacuum assisted reinforced plastic molding press, known as PRV-1558, installed in 1977, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(s) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2024, installed in 1975, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(t) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2025, installed in 1975, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(u) One (1) W-W-M 2000 ton vacuum assisted reinforced plastic molding press, known as PRV-2059, installed in 1984, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(v) One (1) 2500 ton reinforced plastic molding press, known as PR-2566, installed in 2000, capacity: 435 pounds of fiberglass reinforced plastic parts per hour. This press was previously known as PRV-2572.

(w) One (1) 2500 ton reinforced plastic molding press, known as PR-2567, installed in 2000, capacity: 435 pounds of fiberglass reinforced plastic parts per hour. This press was previously known as PRV-2573.

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

(x) One (1) W-W-M 4400 ton vacuum assisted reinforced plastic molding press, known as PRV-4470, installed in 1995, capacity: 263 pounds of fiberglass reinforced plastic parts per hour.

(aa) One (1) French 600 ton vacuum assisted reinforced plastic molding press, known as PRV-0648, installed in 1978 and rebuilt in 1990, capacity: 219 pounds of fiberglass reinforced plastic parts per hour.

(bb) One (1) French 800 ton vacuum assisted reinforced plastic molding press, known as PR-0849, installed in 1978 and rebuilt in 1990, capacity: 188 pounds of fiberglass reinforced plastic parts per hour.

(cc) One (1) EEMCO 1,000 ton vacuum assisted reinforced plastic molding press, known as PRV-1026, installed in 1977 and rebuilt in 1990, capacity: 275 pounds of fiberglass reinforced plastic parts per hour.

(dd) One (1) HPM Corporation Injection Molding Press, known as PR-1571, installed in 1998, capacity: 188 pounds of fiberglass reinforced plastic parts per hour.

(ee) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

(ff) One (1) fiberglass reinforced composites touch up spray booth, known as TU-SPLASH, equipped with air atomization spray guns and dry filters for overspray control, exhausted through stack R, maximum capacity: 0.336 gallons of paint per hour.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The VOC delivered to the applicators from the four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32), the four (4) touch-up booths (TU-A, TU-B ,TU-FNSH and TU-SPLASH), the two (2) polyester products raw materials compounding lines (SMC-MFG1 and SMC-MFG3), the eighteen (18) Reinforced Plastic Molding Presses, installed between 1968 and 1998 (PR-0206, PR-0213, PR-0419, PR-0420, PR-0617, PR-0618, PRV-0648, PRV-0849, PRV-1026, PRV-1222, PRV -1223, PR-1250, PRV-1558, PRV-2024, PRV-2025, PRV-2059, PRV-4470, PR-1571), and the two (2) 2500 ton Reinforced Plastic Molding Presses, constructed in 2000 (PR-2566 and PR-2567) shall be limited such that the total VOC emissions are no more than 246.1 tons per twelve (12) consecutive month period.

The SMC closed molding operations performed by the eighteen (18) Reinforced Plastic Molding Presses shall use the standard US EPA AP-42 three percent (3.0%) VOC emission factor to determine compliance with the VOC emission limit.

(b) This VOC emission limit combined with the full potential to emit VOC from the two (2) boilers and 3.23 tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.2.2 Hazardous Air Pollutants [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), the use of resins, cleanup solvents, and other material containing hazardous air pollutants (HAPs) from the two (2) 2,500 ton reinforced plastic molding presses, known as PR-2566 and PR-2567, shall be limited such that the potential to emit (PTE) a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period, each. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.2.3 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more from any of the reinforced plastic molding presses (PR-0206, PR-0213, PR-0419, PR-0420, PR-0617, PR-0618, PRV-1222, PRV-1223, PRV-1250, PRV-1558, PRV-2024, PRV-2025, PRV-2059, PR-2566, PR-2567, PRV-4470, PRV-0648, PR-0849, PRV-1026, PR-1571, PR-1572) shall obtain prior approval from IDEM, OAQ.

D.2.4 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

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

D.2.5 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

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

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

(1) Open molding;

(2) Closed molding;

(3) Cenrtifugal casting;

(4) Continuous lamination;

(5) Polymer casting;

(6) Pultrusion;

(7) Sheet molding compound (SMC) manufacturing; and

(8) Bulk molding compound (BMC) manufacturing.

Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer including the SMC usage and emission factors for the SMC operations.

D.2.7 VOC and HAPs Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.8 HAPs Emissions

Compliance with the HAP usage limitation in Condition D.2.2 shall be determined based upon the following criteria:

(a) Monthly usage by weight, HAP monomer content, method of application, and other emission reduction techniques for each resin shall be recorded.

(b) HAPs emissions from each type of emitting material shall be calculated as follows:

(1) Resins

Multiply the usage of each resin by the HAP monomer content of each resin and by the emission factor for closed molding taken from US EPA's AP-42 document. Any volatile HAP contained in the resin that is not monomer is assumed to be 100% emitted.

(2) All Other Materials

Any volatile HAP contained in the other materials is assumed to be 100% emitted.

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

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCS emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.2.2.

(1) The amount and HAP content of each resin and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The total HAP usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of the throughput of fiberglass through each reinforced plastic molding presses and the percent resin content of the fiberglass.

(d) 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 Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.2.11 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.2.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

(b) The significant permit modification application shall be submitted no later than July 21, 2005.

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Meridian Automotive Systems, Inc.**
Source Location:	**14123 Roth Road, Grabill, Indiana 46741-0189**
County:	**Allen**
SIC Code:	**3089**
Operation Permit No.:	**T 003-5942-00059**
Operation Permit Issuance Date:	**March 26, 2002**
Minor Source Modification No.:	**MSM 003-19600-00059**
Significant Permit Modification No.:	**SPM 003-19660-00059**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a modification application from Meridian Automotive Systems, Inc. relating to the construction of the following emission units and pollution control devices:

(a) One (1) SMC machine, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour.

(b) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

History

Meridian Automotive Systems, Inc. was issued a Part 70 permit for a high-pressure fiberglass-reinforced plastics manufacturing and painting source on March 26, 2002. On June 25, 2004, Meridian Automotive Systems, Inc. submitted an application to the OAQ requesting to add one (1) SMC machine and one (1) injection molding press to their existing plant. The one (1) SMC machine (Machine 3) will be associated with the existing SMC machines (Machine 1 and Machine 2), and will make use of the resin storage tanks, the SMC mixing room, and the SMC holding area associated with Machines 1 and 2. The new SMC machine will be ducted to the existing baghouse which exhausts to Stack SV-01.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

No new stacks are proposed.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and 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 June 25, 2004.

Emission Calculations

See page 1 of Appendix A of this document for detailed VOC and HAP emissions calculations.

Particulate calculations supplied by the applicant have been verified to be accurate. The potential to emit before controls of PM and PM_{10} due to the additional SMC machine is 19.4 tons per year. The existing baghouse has a control efficiency of 99%, therefore, potential PM and PM_{10} emissions after control are 0.194 tons per year.

Potential To Emit of Modification

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	19.4
PM_{10}	19.4
SO_2	-
VOC	8.34
CO	-
NO_X	-

HAPs	**Potential To Emit** (tons/year)
Styrene	8.34
TOTAL HAPs	8.34

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4), because the potential to emit of PM_{10} and VOC is less than twenty-five (25) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 003-19660-00059) in accordance with 326 IAC 2-7-12(b)(1)(E) and 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Allen County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/year)
PM	less than 250
PM_{10}	less than 250
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO_X	less than 100

(a) This existing source is a major stationary source because a nonattainment regulated pollutant (VOC) is emitted at a rate of one hundred (100) tons per year or more.

(b) These emissions are based upon the Technical Support Documents for T 003-5942-00059 and SSM 003-16292-00059.

Potential to Emit of Modification After Issuance

Pollutant	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_X (tons/yr)
Proposed Modification	0.194	0.194	-	8.34	-	-
Contemporaneous Increases	-	-	-	-	-	-
Contemporaneous Decreases	-	-	-	-	-	-
Net Emissions	0.194	0.194	-	8.34	-	-
PSD or Offset Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the significant levels. Therefore, the nonattainment new source review requirements do not apply.

Federal Rule Applicability

(a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any criteria pollutant:

(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 as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

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

(c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (326 IAC 14, 326 IAC 20-1-1, and 40 CFR 63, Subpart WWWW). A copy of the MACT is currently available on the U.S. EPA website, http://www.epa.gov/ttn/atw/rpc/rpcpg.html.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification on or before July 21, 2005, which is nine (9) months prior to the compliance date for the MACT (April 21, 2006). The application will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will

include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

State Rule Applicability - Individual Facilities

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

This existing source was a minor source under 326 IAC 2-2 because the potential VOC emissions were limited to less than two hundred fifty (250) tons per year. On June 15, 2004, the U.S. EPA designated Allen County as Basic Nonattainment for the new 8-hour ozone standard. Therefore, since the VOC emissions from the entire source are greater than one hundred (100) tons per year, this source is a major source under the nonattainment area review rules. As stated above, this modification is a minor modification to an existing major source.

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

The new SMC machine (Machine 3) and the new injection molding press (PR-1572) are specifically regulated by a standard under Section 112(d) of the Clean Air Act (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW), therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

The particulate from the three (3) SMC manufacturing lines shall not exceed 23.2 pounds per hour when operating at a process weight rate of 26,670 pounds per hour (13.335 tons per hour), total. This limitation is based upon 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

The dust collection system shall be in operation at all times the three (3) SMC manufacturing lines are in operation, in order to comply with this limit.

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

The potential VOC emissions from the one (1) SMC manufacturing line, known as Machine 3, and the one (1) injection molding press, known as PR-1572, are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to either facility. Any change or modification which would increase the potential to emit VOC from Machine 3 or PR-1572 to twenty-five (25) tons per year or more shall require prior approval from IDEM, OAQ.

Proposed Changes

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

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

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official:	**General Manager** ~~Jim Gregory~~
Source Address:	14123 Roth Road, Grabill, Indiana 46741
Mailing Address:	14123 Roth Road, Grabill, Indiana 46741
General Source Phone Number:	219-627-3612
SIC Code:	3089
County Location:	Allen
Source Location Status:	**Basic Nonattainment for 8-hour ozone** Attainment for all **remaining** criteria pollutants
Source Status:	Part 70 Permit Program ~~Minor Source under PSD Rules;~~ **Major Source, under nonattainment area rules;** Major Source, Section 112 of the Clean Air Act

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

(h) Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, with a capacity of 12,000 pounds of SMC per hour, each, **and one (1) SMC manufacturing line, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour,** consisting of:

(1) sixteen (16) resin storage tanks, with storage capacities between 2,000 and 6,300 gallons, each,

(2) one (1) small add material handling area,

(3) one (1) SMC mix room, consisting of four (4) mixing tanks, seven (7) holding tanks, and six (6) dynamic mixers,

(4) **three (3)** ~~two (2)~~ SMC machines,

(5) one (1) SMC maturation area, and

(6) one (1) dust collection system, exhausted to Stack SV-01.

(ee) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

(**ff** ~~ee~~) One (1) fiberglass reinforced composites touch up spray booth, known as TU-SPLASH, equipped with air atomization spray guns and dry filters for overspray control, exhausted through stack R, maximum capacity: 0.336 gallons of paint per hour.

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

Facility Description [326 IAC 2-7-5(15)]: Painting and Compounding Operations

(h) Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, with a capacity of 12,000 pounds of SMC per hour, each, **and one (1) SMC manufacturing line, known as Machine 3, with a capacity of 2,670 pounds of SMC per hour,** consisting of:

(1) sixteen (16) resin storage tanks, with storage capacities between 2,000 and 6,300 gallons, each,

(2) one (1) small add material handling area,

(3) one (1) SMC mix room, consisting of four (4) mixing tanks, seven (7) holding tanks, and six (6) dynamic mixers,

(4) **three (3)** ~~two (2)~~ SMC machines,

(5) one (1) SMC maturation area, and

(6) one (1) dust collection system, exhausted to Stack SV-01.

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

D.1.1 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to CP 003-3105-00059, issued on September 7, 1993, Best Available Control Technology (BACT) for the one (1) prime spray booth, identified as SB-A, has been determined to be:

(1) The method of application shall be performed with high-volume-low pressure (HVLP) spray applicators;

(2) The use of lower VOC paints (less than 3.5 lb VOC per gallon of coating excluding water).

(b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the two (2) spray booths, identified as SB-C24 and SB-C32, has been determined to be:

(1) The VOC input delivered to the applicators including cleanup solvents shall be limited to a total of no more than sixty-six (66) tons per twelve (12) consecutive month period;

(2) The method of application at the spray booths shall be done with electrostatic applicators;

(3) The use of low (25-40%) and medium (41-50%) solids content coatings, and

(4) The following management and work practices shall apply:

(i) Operator training course.

(ii) Spray gun cleaning.

(iii) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.

(iv) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(v) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(vi) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The VOC applied to the applicators from the four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32), the four (4) touch-up booths (TU-A, TU-B ,TU-FNSH and TU-SPLASH), the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, the eighteen (18) Reinforced Plastic Molding Presses, installed between 1968 and 1998 (PR-0206, PR-0213, PR-0419, PR-0420, PR-0617, PR-0618, PRV-0648, PRV-0849, PRV-1026, PRV-1222, PRV -1223, PR-1250, PRV-1558, PRV-2024, PRV-2025, PRV-2059, PRV-4470, PR-1571), and the two (2) 2500 ton Reinforced Plastic Molding Presses, constructed in 2000 (PR-2566 and PR-2567) shall be limited such that the total VOC emissions are no more than 246.1 tons per twelve (12) consecutive month period.

The SMC closed molding operations performed by the eighteen (18) Reinforced Plastic Molding Presses shall use the standard US EPA AP-42 three percent (3.0%) VOC emission factor to determine compliance with the VOC emission limit.

(b) The VOC emission limit expressed in Condition D.1.2 (a) combined with the full potential to emit VOC from the two (2) boilers and the limited actual emissions not to exceed 3.23 tons per year from other insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Hazardous Air Pollutants [326 IAC 2-4.1-1]

(a) The input of SMC to the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, shall be limited such that the worst case potential to emit a single HAP (styrene) is less than ten (10) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month, to make the requirements of 326 IAC 2-4.1-1 not applicable.

(b) For the purposes of determining the throughput limit, the following HAP emission factors will be used for the processes located at the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2:

(1) Resin Storage Tanks: 0.059 lbs/ton of SMC produced.

(2) Mixing Station: 0.19 lbs/ton of SMC produced.

(3) SMC Machine: 0.30 lbs/ton of SMC produced.

(4) SMC Holding Area: 0.0018 lbs/ton SMC produced.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

(a) The input of SMC to the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2, reconstructed and relocated in 2003, shall be limited such that the potential to emit VOC is less than twenty-five (25) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month, to make the requirements of 326 IAC 8-1-6 not applicable.

(b) For the purposes of determining the throughput limit, the following VOC emission factors will be used for the processes located at the two (2) SMC manufacturing lines, known as Machine 1 and Machine 2:

(1) Resin Storage Tanks: 0.059 lbs/ton of SMC produced.

(2) Mixing Station: 0.19 lbs/ton of SMC produced.

(3) SMC Machine: 0.30 lbs/ton of SMC produced.

(4) SMC Holding Area: 0.0018 lbs/ton SMC produced.

(c) Any change or modification that would increase the potential to emit VOC from Machine 3 to twenty-five (25) tons per year or more shall require prior approval from IDEM, OAQ.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The PM from each spray booth (the one (1) prime spray booth, known as SB-A, the one (1) spray booth, known as SB-B, the one (1) spray booth, known as SB-C24, the one (1) spray booth, known as SB-C32, the one (1) prime touch up, known as TU-A, the one (1) prime touch up, known as TU-B, and the one (1) touch up, known as TU-FNSH) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from **the three (3)** ~~two (2)~~ SMC manufacturing lines, known as Machine 1**,** ~~and~~ Machine 2 **and Machine 3**, shall not exceed **23.3** ~~21.7~~ pounds per hour when operating at a total process weight rate of **26,670** ~~24,000~~ pounds per hour.

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

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

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

D.1.6 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

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

D.1.7 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

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

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

(1) Open molding;

(2) Closed molding;

(3) Centrifugal casting;

(4) Continuous lamination;

(5) Polymer casting;

(6) Pultrusion;

(7) Sheet molding compound (SMC) manufacturing; and

(8) Bulk molding compound (BMC) manufacturing.

Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

D.1.**8**~~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 these facilities and any control devices.

Compliance Determination Requirements

D.1.**9**~~7~~ Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1, D.1.2, D.1.3, and D.1.4 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 for the painting operations, and the SMC usage and emission factors for the SMC operations and the SMC manufacturing lines.

D.1.**10**~~8~~ VOC and HAPs Emissions

Compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.1.**11**~~9~~ Particulate Matter (PM)

(a) The dry filters for PM control shall be in operation at all times when the four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32) and three (3) touch up booths (TU-A, TU-B and TU-FNSH) are in operation.

(b) The dust collection system for PM control shall be in operation at all times when the **three (3)** ~~two (2)~~ SMC manufacturing lines are in operation.

D.1.1**2**~~0~~ Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks B, C, D, E, G, H, I, J, K, L, and P while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.1.1**3**~~1~~ Visible Emissions Notations

(a) Visible emission notations of the **three (3)** ~~two (2)~~ SMC manufacturing lines stack exhaust shall be performed once per shift 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.1**4**~~2~~ Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the **three (3)** ~~two (2)~~ SMC manufacturing lines, at least once per shift when the **three (3)** ~~two (2)~~ SMC manufacturing lines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 8.0 and 12.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.1.1**5**~~3~~ Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the **three (3)** ~~two (2)~~ SMC manufacturing lines. All defective bags shall be replaced.

D.1.1**6**~~4~~ Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.1**7**~~5~~ Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2 and D.1.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCS emitted for each compliance period.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.3.

(1) The amount and HAP content of each resin and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total HAP usage for each month; and

(3) The weight of HAPs emitted for each compliance period.

(c) To document compliance with Condition D.1.1**2**~~0~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.1.1**3**~~1~~, the Permittee shall maintain records of visible emission notations of the **three (3)** ~~two (2)~~ SMC manufacturing lines stack exhaust once per shift.

(e) To document compliance with Condition D.1.1**4**~~2~~, the Permittee shall maintain per shift records of the total static pressure drop during normal operation.

(f) To document compliance with Condition D.1.1**5**~~3~~, the Permittee shall maintain records of the results of the inspections required under Condition D.1.1**5**~~3~~ and the dates the vents are redirected.

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

D.1.1**8**~~6~~ Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.19 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.1.20 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

(b) The significant permit modification application shall be submitted no later than July 21, 2005.

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

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(dd) One (1) HPM Corporation Injection Molding Press, known as PR-1571, installed in 1998, capacity: 188 pounds of fiberglass reinforced plastic parts per hour.

(ee) One (1) 2,000-ton HPM Corporation injection molding press, known as PR-1572, capacity: 300 pounds of fiberglass reinforced plastic parts per hour.

(**ff** ~~ee~~) One (1) fiberglass reinforced composites touch up spray booth, known as TU-SPLASH, equipped with air atomization spray guns and dry filters for overspray control, exhausted through stack R, maximum capacity: 0.336 gallons of paint per hour.

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

D.2.3 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more from any of the reinforced plastic molding presses (PR-0206, PR-0213, PR-0419, PR-0420, PR-0617, PR-0618, PRV-1222, PRV-1223, PRV-1250, PRV-1558, PRV-2024, PRV-2025, PRV-2059, PR-2566, PR-2567, PRV-4470, PRV-0648, PR-0849, PRV-1026, PR-1571**, PR-1572**) shall obtain prior approval from IDEM, OAQ.

D.2.4 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

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

D.2.5 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

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

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

(1) Open molding;

(2) Closed molding;

(3) Centrifugal casting;

(4) Continuous lamination;

(5) Polymer casting;

(6) Pultrusion;

(7) Sheet molding compound (SMC) manufacturing; and

(8) Bulk molding compound (BMC) manufacturing.

Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

Compliance Determination Requirements

D.2.**6**~~4~~ Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer including the SMC usage and emission factors for the SMC operations.

D.2.**7**~~5~~ VOC and HAPs Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.**8**~~6~~ HAPs Emissions

Compliance with the HAP usage limitation in Condition D.2.2 shall be determined based upon the following criteria:

(a) Monthly usage by weight, HAP monomer content, method of application, and other emission reduction techniques for each resin shall be recorded.

(b) HAPs emissions from each type of emitting material shall be calculated as follows:

(1) Resins

Multiply the usage of each resin by the HAP monomer content of each resin and by the emission factor for closed molding taken from US EPA's AP-42 document. Any

volatile HAP contained in the resin that is not monomer is assumed to be 100% emitted.

(2) All Other Materials

Any volatile HAP contained in the other materials is assumed to be 100% emitted.

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

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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

D.2.**9**~~7~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCS emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.2.2.

(1) The amount and HAP content of each resin and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The total HAP usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of the throughput of fiberglass through each reinforced plastic molding presses and the percent resin content of the fiberglass.

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

D.2.**10**~~8~~ Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.2.11 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

(b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V

Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.2.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

(b) The significant permit modification application shall be submitted no later than July 21, 2005.

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

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Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
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Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. **003-19600-00059** and Part 70 Significant Permit Modification No. **003-19660-00059**.

Appendix A: Emissions Calculations
VOC and HAP Emissions
From Closed Molding Operations
Potential Emissions due to addition of SMC Machine 3 and PR-1572

Company Name: Meridian Automotive Systems, Inc.
Address City IN Zip: 14123 Roth Road, Grabill, Indiana 46741
MSM: 003-19600
Plt ID: 003-00059
Reviewer: Edward A. Longenberger
Date: June 25, 2004

Material	SMC Usage (lbs/hour)	SMC Usage (tons/hour)	Emission Factor (lbs/ton)	Potential Emissions (lb/hr)	Potential Emissions (tons/yr)
Resin Storage Tanks					
VOC	2,670	1.34	0.059	0.079	0.345
Styrene	2,670	1.34	0.059	0.079	0.345
Mixing Station					
VOC	2,670	1.34	0.19	0.254	1.111
Styrene	2,670	1.34	0.19	0.254	1.111
SMC Machine					
VOC	2,670	1.34	0.30	0.401	1.754
Styrene	2,670	1.34	0.30	0.401	1.754
SMC Holding Area					
VOC	2,670	1.34	0.0018	0.002	0.011
Styrene	2,670	1.34	0.0018	0.002	0.011
State Potential Emissions				**Total VOC:**	**3.22**
				Total Styrene	**3.22**

METHODOLOGY
Potential Emissions Pounds per Hour = Tons of material used per hour * Emission factor (lbs/ton)
Potential VOC Tons per Year = Potential VOC Pounds per hour * 8760 hrs/yr / 2000 lbs/ton
Emission Factors are based on "Q and A: Composites Manufacturing Emissions" published by the CFA in 1999
Emission factors for the Mixing Station are based on emission factors approved by the Ohio EPA for the same process. These factors were based on a stack test.

Material	Weight % VOC	Weight % Styrene Monomer	SMC Usage (lbs/hour)	Flash Off (%)	Potential VOC (pounds/hour)	Potential VOC (pounds/day)	Potential VOC (tons/year)	Potential Styrene (tons/year)
Injection Molding Press (SMC)								
PR-1572	13.00%	13.00%	300	3.0%	1.17	28.08	5.12	5.12
State Potential Emissions					**1.17**	**28.08**	**5.12**	**5.12**

METHODOLOGY
Potential VOC Pounds per Hour = Pounds of material used per hour * VOC content * flash off factor
Potential VOC Tons per Year = Potential VOC Pounds per Hour * 8760 hrs/yr / 2000 lbs/ton
Potential Styrene Tons per Year = Pounds of material used per hour * Styrene monomer content * flash off factor * (8,760 hrs/yr/ 2,000 lbs/ton)
Flash off factors are based on AP-42 Table 4.4-2 for closed molding operations