



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 19, 2004

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

TO: Interested Parties / Applicant

RE: Meridian Automotive Systems, Inc. / SPM 003-19660-00059

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 permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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October 19, 2004

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

Re: **003-19660-00059**
Significant Permit Modification to:
Part 70 Operating Permit No.: **T 003-5942-00059**

Dear Mr. Swann:

Meridian Automotive Systems, Inc. was issued a permit on March 26, 2002 for a high-pressure fiberglass-reinforced plastics manufacturing and painting source. A letter requesting changes to this permit was received on June 25, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification relates to the operation of one (1) SMC machine, known as Machine 3, and one (1) injection molding press, known as PR-1572.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact 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
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector – Patrick Burton
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



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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.

Operation Permit No.: T 003-5942-00059	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 26, 2002 Expiration Date: March 26, 2007

First Significant Source Modification 003-16292, issued March 11, 2003
First Significant Permit Modification 003-16861, issued March 14, 2003
First Administrative Amendment 003-16866, issued May 5, 2003
First Minor Source Modification 003-19600, issued August 19, 2004

Second Significant Permit Modification No.: 003-19660-00059	Pages Affected: 6, 7, 8, 29 - 44
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 19, 2004

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.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 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)]

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 through stack R, maximum capacity: 0.336 gallons of paint per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, rated at a total of 69.9 million British thermal units per hour, including:

One (1) hook oven, known as BO-PH, installed in 1991, exhausted to stack Q, rated at 0.4 million British thermal units per hour, capacity: 10 pounds of waste per hour. (326 IAC 4-2-2)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3-2)
- (d) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)
- (e) Activities with emissions equal to or less than the following thresholds: Lead (Pb): 0.6 tons per year or 3.29 pounds per day, SO₂: five (5) pounds per hour or twenty-five (25) pounds per day, NO_x: five (5) pounds per hour or twenty-five (25) pounds per day, CO: twenty-five (25) pounds per day, PM: five (5) pounds per hour or twenty-five (25) pounds per day, and VOC: three (3) pounds per hour or fifteen (15) pounds per day:

Drilling, Trimming, Sanding of Fiberglass Reinforced Plastic Parts (326 IAC 6-3-2)
- (f) Two (2) buffing table booths with filters and stacks located in the C-shop. (326 IAC 6-3-2)
- (g) One (1) maintenance paint booth, used for touch up of equipment, identified as GRB-PB-SMC1, capacity: 5 gallons of paint per month, equivalent to VOC emissions of 222 pounds per year. (326 IAC 6-3-2)

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

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

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

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year 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
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

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

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

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

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

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

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

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

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

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

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

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

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

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

and

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

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10.1 (a), (c), (d) and (e), emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

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

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

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

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

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68,

including the registration and submission of a Risk Management Plan (RMP);

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The documents submitted pursuant to this condition does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

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

- (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:

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

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) 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 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:

Meridian Automotive Systems, Inc.
Grabill, Indiana
Permit Reviewer: CJF/MES

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Revised by: EAL/MES

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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.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Two (2) natural gas-fired boilers

(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.

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

Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one (1) boiler, identified as BLR-B, shall not exceed 0.6 pounds per million British thermal units heat input.

D.3.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), the allowable PM emission rate from the one (1) boiler, known as BLR-A, shall not exceed 0.472 pounds per million British thermal units heat input when operating at 16.7 million British thermal units per hour.

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.40c]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the sixteen and seven tenths (16.7) MMBtu per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) boiler known as BLR-A.

Compliance Determination Requirements

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

- (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the two (2) boilers, known as BLR-A and BLR-B stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere when burning diesel fuel. 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.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.3 and D.3.5, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and

- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts once per shift when burning diesel fuel.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34);
- (b) The natural gas boiler certification 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 six (6) month period being reported.
- (c) A semi-annual summary of the information to document compliance with Condition 3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, rated at a total of 69.9 million British thermal units per hour, including:

One (1) hook oven, known as BO-PH, installed in 1991, exhausted to stack Q, rated at 0.4 million British thermal units per hour, capacity: 10 pounds of waste per hour. (326 IAC 4-2-2)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3-2)
- (d) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)
- (e) Activities with emissions equal to or less than the following thresholds: Lead (Pb): 0.6 tons per year or 3.29 pounds per day, SO₂: five (5) pounds per hour or twenty-five (25) pounds per day, NO_x: five (5) pounds per hour or twenty-five (25) pounds per day, CO: twenty-five (25) pounds per day, PM: five (5) pounds per hour or twenty-five (25) pounds per day, and VOC: three (3) pounds per hour or fifteen (15) pounds per day:

Drilling, Trimming, Sanding of Fiberglass Reinforced Plastic Parts (326 IAC 6-3-2)
- (f) Two (2) buffing table booths with filters and stacks located in the C-shop. (326 IAC 6-3-2)
- (g) One (1) maintenance paint booth, used for touch up of equipment, identified as GRB-PB-SMC1, capacity: 5 gallons of paint per month, equivalent to VOC emissions of 222 pounds per year. (326 IAC 6-3-2)

(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.4.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the one (1) hook oven, known as BO-PH, which serves as an incinerator, shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 (Opacity limitations) and 326 IAC 2 (Permit Review Rules);
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM;
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM;

- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous materials including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented;
- (h) Not create a nuisance or a fire hazard; and
- (i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of the incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing, cutting, soldering, welding and trimming, drilling, sanding, buffing, and maintenance painting operations shall not exceed the allowable PM emission rate based on 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:

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

D.4.3 Volatile Organic Compounds [326 IAC 8-2-9]

Any change or modification which would increase the actual VOC emissions to fifteen (15) pounds per day or more from the one (1) maintenance paint booth, when coating metal, shall obtain prior approval from IDEM, OAQ.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these insignificant activities.

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 insignificant activities.

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

D.4.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.
 - (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 total VOC usage for each day; and
- (4) The weight of VOCs emitted for each compliance period.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059
Facilities: Two (2) spray booths, known as SB-C24 and SB-C32
Parameter: Total VOC delivered to the applicators
Limit: Sixty-six (66) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059
Facilities: Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2.
Parameter: VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059
Facilities: Two (2) SMC manufacturing lines, known as Machine 1 and Machine 2
Parameter: Individual HAP
Limit: Less than ten (10) tons per twelve (12) consecutive month period, each, with compliance determined at the end of each month.

YEAR:

Month	Individual HAP (tons)	Individual HAP (tons)	Individual HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059
Facilities: Two (2) 2500 ton plastic molding presses, known as PR-2566 and PR-2567
Parameter: Individual HAP
Limit: Less than ten (10) tons per twelve (12) consecutive month period, each.

YEAR: _____

Month	Individual HAP (Tons)	Individual HAP (Tons)	Individual HAP (Tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 14123 Roth Road, Grabill, Indiana 46741
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
Part 70 Permit No.: T 003-5942-00059
Facilities: Four (4) spray booths (SB-A, SB-B, SB-C24 and SB-C32), four (4) touch-up booths (TU-A, TU-B, TU-FNSH, and TU-SPLASH), two (2) polyester products raw materials compounding lines (SMC-MFG1 and SMC-MFG3), 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)
Parameter: VOC emissions
Limit: Less than 246.1 tons per twelve (12) consecutive month period, total.

YEAR: _____

Month	VOC (Tons)	VOC (Tons)	VOC (Tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Meridian Automotive Systems
 Source Address: 14123 Roth Road, Grabill, Indiana 46741
 Mailing Address: 14123 Roth Road, Grabill, Indiana 46741
 Part 70 Permit No.: T 003-5942-00059

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

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

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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 PM₁₀ 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 PM₁₀ 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 PM₁₀ 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
Source Status:	Attainment for all remaining criteria pollutants 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:

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

- (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:

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

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.1.86 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.1.97 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.1.108 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.1.119 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.1.120 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.1.134 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.1.142 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.1.153 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.1.164 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.1.175 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.1.120, 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.1.134, 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.1.142, the Permittee shall maintain per shift records of the total static pressure drop during normal operation.
- (f) To document compliance with Condition D.1.153, the Permittee shall maintain records of the results of the inspections required under Condition D.1.153 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.1.186 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.2.64 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.2.75 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.2.86 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.2.97 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.2.108 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**

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**.

Indiana Department of Environmental Management Office of Air Quality

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

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

On August 19, 2004, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette in Fort Wayne, Indiana, stating that Meridian Automotive Systems, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit to operate an SMC machine and an injection molding press. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Significant Permit Modification to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

This source is located in a county which has been designated as nonattainment for the 8-hour ozone standard, and a nonattainment regulated pollutant (VOC) is emitted at a rate of one hundred (100) tons per year or more. Therefore, this source is a major source under the nonattainment area review rules. However, the source remains a minor source under PSD, since all attainment regulated pollutants are emitted at a rate less than two-hundred fifty (250) tons per year. Therefore, the minor PSD source designation has been restored in Condition A.1 of the Part 70 permit:

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

The Permittee owns and operates a stationary 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 Minor Source, under PSD rules; Major Source, under nonattainment area rules; Major Source, Section 112 of the Clean Air Act

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
SPM: 003-19660
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