



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: February 15, 2005
RE: Ashley Industrial Molding, Inc / 033-20041-00017
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05

February 15, 2005

Mr. Rod Schoon
Ashley Industrial Molding, Inc.
P.O. Box 398
Ashley, IN 46705-0398

Re: **033-20041-00017**
Second Administrative Amendment to
Part 70 033-5941-00017

Dear Mr. Schoon:

Ashley Industrial Molding, Inc. was issued a permit on July 31, 2001 for a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting operation. A letter requesting a change was received on December 22, 2004. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Specifically, Ashley Industrial Molding Inc. has submitted an application to add one (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.

The proposed press will not affect the production rates or emissions from any of the other existing source emission units. Therefore, the emissions due to the proposed changes are the molding press VOC emissions and the VOC and HAP emissions associated with the press cleanup.

The VOC, single HAP, and combined HAP unrestricted emissions due to the proposed modification are estimated to be 7.06, 3.99, and 3.99 tons per year, respectively.

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is less than the 326 IAC 2-7-10.5(d)(3)(B)(iii) Minor Source Modification applicable level of 10 tons per year. Therefore, no source modification for the proposed modification is required.

The proposed changes shall be incorporated into the permit via an administrative amendment pursuant to 326 IAC 2-7-11(a)(7) which states that changes which consist of revisions of descriptive information where the revisions will not trigger a new applicable requirement or violate a permit term may be incorporated into the permit via an administrative amendment.

To incorporate the proposed molding press into the permit, the following changes shall be made.

The unit description of Condition A.2 shall be changed as follows to include the proposed molding press unit description.

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

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

(a) One (1) surface coating line, consisting of:

.....

(v) One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

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

Attachments
SDF

cc: File - Dekalb County
U.S. EPA, Region V
DeKalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section
Administrative and Development

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Ashley Industrial Molding, Inc.
320 South Wabash Avenue
Ashley, Indiana 46705**

(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 033-5941-00017	Date Issued: July 31, 2001 Expiration Date: July 31, 2006
Issued by: Janet G. McCabe, Assistant Commissioner, Office of Air Quality	
First Administrative Amendment No. 033-14753-00017	Date Issued: August 28, 2001
First Significant Permit Modification No. 033-17813-00017	Date Issued: October 5, 2004
Second Administrative Amendment No.: 033-20041-00017	Affected Pages: 5, 6, and 7
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	February 15, 2005

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:	Rodney Schoon
Source Address:	320 South Wabash Avenue
Mailing Address:	320 South Wabash Avenue
General Source Phone Number:	260-587-9155
SIC Code:	3089
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD 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:

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British thermal units per hour.

- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.

- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.
- (v) One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.

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) 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)
- (b) 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)
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)

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).

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to an Existing Part 70 Permit

Source Background and Description

Source Name: Ashley Industrial Molding, Inc.
 Source Location: 320 South Wabash Avenue, Ashley, Indiana 46705
 County: Dekalb
 SIC Code: 3089
 Operation Permit No.: T 033-5941-00017
 Operation Permit Issuance Date: July 31, 2001
 Second Administrative Amendment No.: 033-20041-00017
 Permit Reviewer: SDF

Ashley Industrial Molding, Inc. has submitted a request to modify their existing stationary high-pressure fiberglass-reinforced plastics manufacturing and painting operation.

Specifically, Ashley Industrial Molding Inc. has submitted an application to add one (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.

The proposed press will not affect the production rates or emissions from any of the other existing source emission units. Therefore, the emissions due to the proposed changes are the molding press VOC emissions and the VOC and HAP emissions associated with the press cleanup.

The VOC, single HAP, and combined HAP unrestricted emissions due to the proposed modification are estimated to be 7.06, 3.99, and 3.99 tons per year, respectively.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
V-DCPD-PR1	Press PR1	37	1.3	3,000	180

Existing Approvals

The source has been operating under Part 70 permit 033-5941-00017, issued on July 31, 2001, First Administrative Amendment 033-14753-00017, issued on August 28, 2001, and First Significant Permit Modification 033-17813-00017, issued on October 5, 2004.

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment 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 provided by the applicant via phone on February 1, 2005.

An application for the purposes of this review was received on December 22, 2004.

Emission Calculations

The proposed press will not affect the production rates or emissions from any of the other existing source emission units. Therefore, the emissions due to the proposed changes are the molding press VOC emissions and the VOC and HAP emissions associated with the press cleanup.

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

Unrestricted Potential To Emit (UPTE):

(a) Press Emissions:

The proposed molding press generates VOC emissions. The following calculations determine the molding press VOC emissions based on a manufacturer's emission factor of 2.0 lb VOC/ton of product, a maximum production rate of 10 parts per hour, a maximum product weight of 70 lb/part, emissions before controls, and 8760 hours of operation.

$$\begin{aligned} 10 \text{ parts/hr} * 70 \text{ lb/part} * 1/2000 \text{ tons/lb} * 8760 \text{ hr/yr} &= 3066 \text{ tons product/yr} \\ 3066 \text{ tons product/yr} * 2.0 \text{ lb VOC/ton product} * 1/2000 \text{ tons VOC/lb VOC} &= 3.07 \text{ tons VOC/yr} \end{aligned}$$

(b) Cleanup Solvent Emissions:

The cleanup solvent associated with the proposed molding operation is toluene. Toluene is both a VOC and HAP.

VOC:

The following calculations determine the cleanup solvent VOC emissions based on an emissions factor of 2.6 lb VOC/ton of product (as derived from the MSDS), a maximum production rate of 10 parts per hour, a maximum product weight of 70 lb/part, emissions before controls, and 8760 hours of operation.

$$\begin{aligned} 10 \text{ parts/hr} * 70 \text{ lb/part} * 1/2000 \text{ tons/lb} * 8760 \text{ hr/yr} &= 3066 \text{ tons product/yr} \\ 3066 \text{ tons product/yr} * 2.6 \text{ lb VOC/ton product} * 1/2000 \text{ tons VOC/lb VOC} &= 3.99 \text{ tons VOC/yr} \end{aligned}$$

HAP:

As previously mentioned, toluene is both a VOC and a HAP. Therefore, the HAP emissions are equal to the estimated VOC emissions, or 3.99 tons/yr.

Total UPTE:

The total UPTE due to the modification is the sum of the estimated press and cleanup solvent emissions.

	VOC (tons/yr)	HAP (tons/yr)
Press	3.07	-
Cleanup Solvent	3.99	3.99
Total	7.06	3.99

Emissions After Controls:

The proposed press emissions are uncontrolled. Therefore, the emissions after controls are determined to be equal to the estimated emissions before controls.

	VOC (tons/yr)	HAP (tons/yr)
Press	3.07	-
Cleanup Solvent	3.99	3.99
Total	7.06	3.99

Potential To Emit

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 due to the proposed changes. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	7.06
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Worst case Single HAP	3.99
TOTAL	3.99

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is less than the 326 IAC 2-7-10.5(d)(3)(B)(iii) Minor Source Modification applicable level of 10 tons per year.

Therefore, no source modification for the proposed modification is required.

- (a) This existing source is an existing 326 IAC 2-2 federal minor source because no criteria pollutant emissions exceed their applicable level of 250 tons per year.
- (b) This existing source is a Title V major stationary source because the allowable VOC emissions exceed the applicable major source level of 100 tons per year and the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Potential to Emit After Issuance

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

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source After Modification	26.3	26.1	17.9	23.0	<250	14.9	>10	>25
Fed. Major Source Levels	250	250	250	100	100	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source after the proposed modification is still a 326 IAC 2-2 federal minor source because no criteria pollutant emissions exceed their applicable level of 250 tons per year.
- (b) This source after the proposed modification is still a Title V major stationary source because the allowable VOC emissions exceed the applicable major source level of 100 tons per year and the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

- (a) The proposed changes do not trigger any new applicable New Source Performance Standards (NSPS)(40 CFR Part 60) or result in any changes to any existing NSPS determinations.
- (b) The proposed changes do not trigger any new applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 61 and 63) or result in any changes to any existing NESHAP determinations.

State Rule Applicability - Individual Facilities

(a) 326 IAC 2-2 (Prevention of Significant Deterioration):

The requirements of 326 IAC 2-2 do not apply to the proposed equipment because the source VOC emissions are still limited to less than the applicable level of 250 tons per year.

(b) 326 IAC 2-6 (Emission Reporting):

This source is still subject to the requirements of 326 IAC 2-6.

(c) 326 IAC 4:

The source is still subject to the requirements of 326 IAC 4.

(d) 326 IAC 5:

The source is still subject to the requirements of 326 IAC 5.

State Rule Applicability - Individual Facilities

(a) 326 IAC 2-4.1:

The requirements of 326 IAC 2-4.1 do not apply to the proposed modification because 326 IAC 2-4.1 does not apply to modifications.

(b) 326 IAC 8-1-6:

Although there are no other applicable Article 8 rules that apply to the proposed modification, the requirements of 326 IAC 8-1-6 do not apply because the unrestricted potential VOC emissions (7.06 tons/yr) are less than the applicable level of 25 tons per year.

Changes

Unit Description of Condition A.2:

The unit description of Condition A.2 shall be changed as follows to include the proposed molding press unit description.

The proposed molding press unit description is not included with the specifically regulated insignificant activities identified in Condition A.3 because the modification is not an insignificant activity as defined in 326 IAC 2-7-1(21) (the unrestricted VOC emissions (38.68 lb/day) are greater than the 326 IAC 2-7-1(21)(A)(iv) level of 15 lb/day) and there are no applicable requirements.

The proposed molding press unit description is not included in the applicable Section D unit description because there are no applicable requirements associated with the proposed molding press.

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

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

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

(a) One (1) surface coating line, consisting of:

.....

(v) One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 033-20041-00017.