



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: May 2, 2005

RE: Millennium Products, Inc. / SPM 039-20209-00067

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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**May 2, 2005**

Ms. Kathy Miller  
Millennium Products, Inc. and Millennium Van Tops, Inc.  
P.O. Box 1867  
Elkhart, Indiana 46517

Re: 039-20209-00067  
First Significant Permit Modification to  
Part 70 No.: T039-7096-00067

Dear Ms. Miller:

Millennium Products, Inc. and Millennium Van Tops, Inc., was issued a Part 70 permit on December 28, 1999 for a source that manufactures fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

A letter requesting changes to this permit was received on January 4, 2005. 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 consists of incorporating into the Part 70 permit the following emission units permitted in Significant Source Modification 039-19809-00067:

- (a) One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gel coat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.

This new production line will utilize the existing sanding and grinding booth.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments

APD

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office – Paul Karkiewicz  
Air Compliance Section Inspector - Compliance Data Section  
Administrative and Development



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Millennium Products, Inc. and Millennium Van Tops, Inc.  
 57755 Holiday Place  
 Elkhart, Indiana 46517**

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

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

Operation Permit No.: T039-7096-00067	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 28, 1999  Expiration Date: December 28, 2004
1 <sup>st</sup> Administrative Amendment No.: 039-11793-00067, issued on February 22, 2000; 2 <sup>nd</sup> Administrative Amendment No.: 039-12130-00067, issued on April 20, 2000; Reopening No.: 039-13260-00067, issued on January 14, 2002; 3 <sup>rd</sup> Administrative Amendment No.: 039-14074-00067, issued on May 30, 2001; 4 <sup>th</sup> Administrative Amendment No.: 039-14485-00067, issued on August 7, 2001; and 5 <sup>th</sup> Administrative Amendment No.: 039-16279-00067, issued on August 20, 2002;	
1 <sup>st</sup> Significant Permit Modification No.: 039-20209-00067	Pages Affected: 1-6, 25-31, 39 Pages Added: 27a, 31a, 31b, 39a
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: May 2, 2005

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- D.2.3 Particulate Matter (PM)

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

Responsible Official:	Kathy Miller
Source Address:	57755 Holiday Place, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 1867, Elkhart, Indiana 46515
General Source Phone Number:	(574) 293-3840
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under Emission Offset Minor Source under PSD Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gel coat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gel coat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.
- (b) One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gel coat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.  
  
This new production line will utilize the existing sanding and grinding booth.
- (c) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

- (d) Touch-up paint operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, and exhausting inside the building.
- (e) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.
- (f) One sanding/grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, controlled by a dust collector with a control efficiency of 99%, and exhausting inside the building.

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

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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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); and,
- (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).

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (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.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm), the Permittee shall comply with following:

- (1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll) at an existing emissions unit, document and maintain the following records:
  - (A) A description of the project.
  - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
  - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
    - (i) Baseline actual emissions;
    - (ii) Projected actual emissions;
    - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
    - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, *on* or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual 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, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and 326 IAC 2-3-1 (qq) for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report,  
  
Reports required in this part shall be submitted to:  
  
Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gel coat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gel coat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.
- (b) One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gel coat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.  

This new production line will utilize the existing sanding and grinding booth.
- (c) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.
- (b) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.
- (c) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

(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 (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 039-4439-00067, issued May 30, 1996, and 326 IAC 8-1-6 (New facilities; general reduction requirements), compliance for the fiberglass reinforced plastic manufacturing operations (B5, B6, and B7), surface coating operations (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall be accomplished by the following:
  - (1) All booths shall utilize Fluid Impingement Technology (FIT) or high volume low pressure (HVLP) spray applicators at all times for gel coat and chop operations;
  - (2) The average styrene concentration in the resin used in the chop coat booths and the gel coat booths shall not exceed 40%;
  - (3) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75%; and,
  - (4) Acetone shall be used to clean spray guns used from spray coating of gel coat

and resins. Lacquer thinner shall be used to clean spray guns used from surface coating and touch-up painting.

- (b) Pursuant to 326 IAC 8-1-6, the new Fiberglass Reinforced Plastic Production Line 2 Best Available Control Technology (BACT) shall be the following:
- (1) The use of resins, gel coats, including clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the VOC potential emissions from the new Fiberglass Reinforced Plastic Production Line 2 shall be limited to 39.5 tons per 12 consecutive month period with compliance determined at the end of each month.
  - (2) Gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight.
  - (3) Compliance with these monomer content limit shall be demonstrated on a monthly basis. If all of the gel coats used during a month meet the specified monomer content limit, maintaining records of content and usage as specified in Condition D.1.11 is sufficient for demonstrating compliance. Compliance with the monomer content limit may also be demonstrated using monthly emission averaging within each gel coat application category, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limit for gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

- (4) The gel coat application shall be by any of the following spray technologies: non-atomized spray application technology, air assisted airless, airless, High Volume Low Pressure (HVLP) , and equivalent emission reduction technologies.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) Work practices standards shall be implemented as follows:
- (A) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
  - (B) Except for mixing containers as described in item (G), VOC containing materials shall be kept in a closed container when not in use.
  - (C) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
  - (D) Solvent collection containers shall be kept closed when not in use.
  - (E) Clean-up rags with solvent shall be stored in closed containers.
  - (F) Closed containers shall be used for the storage of the following:
    - (i) All production and tooling gel coats that contain HAPs,
    - (ii) All production and tooling resins that contain HAPs,
    - (iii) Waste resins and gel coats that contain HAPs
    - (iv) Cleaning materials, including waste cleaning materials,
    - (v) Other materials that contain HAPs.
  - (G) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to 326 IAC 2-3, the use of resins, gel coats, including clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the VOC potential to emit from the new Fiberglass Reinforced Plastic Production Line 2 shall be limited to 39.5 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC, Emission Offset not applicable and shall satisfy the BACT VOC emission limit in D.1.1 (b).

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-039-4439-00067, issued on May 30, 1996, use of resins, gel coats, dilution solvents, cleaning solvents, coatings, waxes, and fillers for fiberglass operations, miscellaneous operations, surface coating, and insignificant activities shall be limited such that the potential to emit (PTE) VOC from these materials shall be less than 250 tons per twelve (12) consecutive months. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit for the resins and gel coats shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by

IDEM, OAQ.

- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52, Subpart P]

- (a) Pursuant to CP-039-4439-00067, issued on May 30, 1996, the PM from the three (3) fiberglass reinforced plastic component manufacturing booths (B5, B6, and B7), two (2) surface coating booths (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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 40 CFR 52, Subpart P, the particulate matter emission from the new Fiberglass Reinforced Plastic Production Line's Gel coat Booth, GG-03 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

D.1.5 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 this facility and any control devices.

**Compliance Determination Requirements**

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1(b), D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the monomer content and usage limitation contained in Conditions D.1.1(b), D.1.2, and D.1.3 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. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.8 VOC Emissions

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

#### D.1.9 Particulate Matter (PM)

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- (a) The dry filters for PM control shall be in operation at all times when the surface coating operations (B1 and B8) and fiberglass reinforced plastic component manufacturing operations (B5, B6, and B7) are in operation.
- (b) Pursuant to 326 IAC 6-3-2, the new Gel coat Booth, GG-03 shall be controlled by a dry filter, waterwash, or an equivalent control device, and the owner or operator shall operate the control device in accordance with manufacturer's specifications.

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

#### D.1.10 Monitoring

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- (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 fiberglass reinforced plastic component manufacturing operations stacks (F7, F8, F9, and F10) and the surface coating booth stacks (F1 and F11) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the particulate matter emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plans for these units 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 Plans shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.1.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(b), Condition D.1.2, and Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the monomer content limit established in Condition D.1.1 (b) and the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(b), Condition D.1.2, and Condition D.1.3.
  - (1) The amount and VOC content of each coating material and solvent used; the usage by weight and monomer content of each resin and gel coat; and the usage by weight and VOC content of each wax, catalyst, filler/putty, and clean-up 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 average styrene concentration in the resin and gel used;
  - (4) The cleanup solvent usage for each month;
  - (5) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (6) The total VOC usage for each month; and
  - (7) The weight of VOCs emitted for each month from the fiberglass operations, surface coating operations, touch-up painting operations, spray rim process, and miscellaneous operations.
  - (8) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins and gel coats are used during that month.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1(b), Condition D.1.2, and Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

**Part 70 Quarterly Report**

Source Name: Millennium Products, Inc. and Millennium Van Tops, Inc.  
Source Address: 57755 Holiday Place, Elkhart, Indiana 46517  
Mailing Address: P.O. Box 1867, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7096-00067  
Facility: Fiberglass Reinforced Plastic Production Line 2  
Parameter: Volatile Organic Compounds Emissions  
Limit: 39.5 tons per 12 consecutive month period with compliance determined at the end of each month

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

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

**Source Background and Description**

Source Name:	Millennium Products, Inc. and Millennium Van Tops, Inc.
Source Location:	57755 Holiday Place, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T 039-7096-00067
Operation Permit Issuance Date:	December 28, 1999
Significant Source Modification No.:	039-19809-00067
Significant Permit Modification No.:	039- 20209-00067
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Millennium Products, Inc. and Millennium Van Tops, Inc. relating to the construction of the following emission units to be used in the manufacture of fiberglass reinforced plastic composite parts:

- (a) One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gelcoat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.

This new production line will utilize the existing sanding / grinding booth, which has the capacity to accommodate this new line.

**History**

On November 4, 2004, Millennium Products, Inc. and Millennium Van Tops, Inc., submitted an application to the OAQ requesting to add additional fiberglass production line to their existing plant. , Millennium Products, Inc. and Millennium Van Tops, Inc. was issued a Part 70 permit on December 28, 1998.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Significant 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 November 4, 2004. New application with new information has been submitted on January 4, 2005.

**Emission Calculations**

- (a) Fiberglass Production Line 2: See Page 1 of 1 TSD Appendix for detailed emission calculations.
- (b) Trimming (sanding/grinding) Operation: Minimal amount of trimming will be done for the new fiberglass production line 2, which will utilize the existing sanding / grinding booth. The existing sanding / grinding booth's capacity will not increase, as it has the capacity to accommodate the new production line's trimming operation.

**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	44.14
PM-10	44.14
SO <sub>2</sub>	0.0
VOC	82.58
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Styrene	80.90
MEK	0.838
Toluene	0.838
TOTAL	82.58

**Justification for Modification**

- (a) The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification, pursuant to 326 IAC 2-7-10.5(f), since the source has a PTE of greater than or equal to 25 tons per year of volatile organic compounds (VOC) ; or a single HAP of greater than or equal to 10 tons per year (see above table).
- (b) The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification, pursuant to 326 IAC 2-7-12(d), as it does not qualify as an administrative amendment or minor permit modification.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM/PM10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) 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 emissions and NO<sub>x</sub> are considered when evaluating the rule applicability relating to ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.
- (b) Elkhart County has been classified as attainment for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD).

**Source Status**

Existing Source PSD or Emission Offset Definition (added the emissions after control from all emission units in the Part 70 039-7096-00067, issued on December 28, 1999, including emission limits).

Pollutant	Emissions (tons/year)
PM	36.63
PM-10	36.90
SO <sub>2</sub>	0.042
VOC	Limited to < 250
CO	5.9
NO <sub>x</sub>	7.01

This existing source is a major stationary source because VOC is emitted at a rate of 100 tons per year or more, and it is not one of the 28 listed source categories.

**Potential to Emit of Modification after Issuance Reflecting Major PSD or NA NSR Applicability**

The table below summarizes the potential to emit of emission units involved in this modification project, reflecting all limits of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
New Fiberglass Production Line 2	0.42	0.42	0.0	39.5	0.0	0.0	38.7 single HAP 39.582.58 combined HAPs
PSD Significant Levels	25	15	40	-	40	-	-
Emission Offset Significant Level	-	-	-	40	-	100	-

\*- Since the VOC is limited to < 40 tons/yr the PM/PM10 controlled and HAPs emissions will be scaled down as follows:

PM/PM10 = VOC limit, 39.5 tons/yr/VOC PTE, 82.58 \* controlled PM/PM10, 0.88 ton/yr  
 = 0.42 ton/yr

Worst Single HAP = 39.5 tons/yr /82.58 \* 80.9 tons styrene/yr  
 = 38.7 tons/yr

Combined HAPs = 39.5 tons/yr /82.58 \* 82.58 tons HAPs/yr  
 = 39.5 tons/yr

- (a) This new Fiberglass Production Line 2 will not affect existing emission units except for the existing Sanding/Grinding operations. The Permittee has provided information as part of this application for this approval that is based on Actual to Projected Actual test in (326 IAC 2-2) this modification at a major stationary source. The PM/PM10 emissions increase is negligible since it is controlled by a dust collector and therefore, will not trigger a major review for Prevention of Significant Deterioration (PSD). IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The source will be required to operate the dust collector at all times when Sanding/Grinding parts.
- (b) This modification to an existing major source is not major under 326 IAC 2-3 because VOC is not emitted at 40 tons per year or greater, as it is limited below this level. Therefore, the modification is not subject to major NSR review.

**Potential to Emit After Modification**

Pollutant	PM	PM10	SO2	VOC	CO	NOx	HAPs
Existing Source PTE Level	36.63	36.90	0.042	249	5.90	7.01	249*
Total Source PTE After Modification Issuance	37.05	37.32	0.042	288.5	5.90	7.01	288.58

\* styrene is the same as the VOC that is limited to 249 tons/yr.

**Federal Rule Applicability**

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60).
  - (1) There are no New Source Performance Standards included in this permit for this modification.
  
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63)
  - 40 CFR 63, Subpart WWWW
  - The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 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 nine months prior to the compliance date for the MACT, April 21, 2006, that 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, 2007.
- (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.

**No detailed requirements from this rule will be included in this modification.**

- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included for this proposed modification.

**State Rule Applicability –Entire Source**

- (a) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:
- (1) 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.
  - (2) 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.
- (b) 326 IAC 2-3 (Major NSR)  
The existing source is an existing major source, as it emits VOC emissions greater than 100 tons per year.

**State Rule Applicability - Individual Facilities**

- (a) 326 IAC 2-3 (Major NSR)  
This modification to an existing major source is not major under the 8-hour ozone, as it is limited to less than 40 tons per year of VOC, significant level for major NSR review.
- (b) 326 IAC 20-25 (Emissions from Reinforced Plastic Composites Fabricating Emission Units)  
The source will be subject to this rule, as it is a major source of HAPs emissions. The new Fiberglass Reinforced Plastic Production Line 2 by itself has a PTE of 80.90 tons of styrene per year and 82.58 tons of combined HAPs per year. No detailed requirements from this rule will be included in this modification.
- (c) 326 IAC 8-1-6 (New Facilities General Reduction Requirements)  
This rule applies to new facilities as January 1, 1980, which have potential VOC emissions of 25 tons per year or greater that are not regulated by other provisions of this article, 326 IAC 8.

The new Fiberglass Reinforced Plastic Production Line 2 is subject to 326 IAC 8-1-6, as its limited potential VOC emission is still greater than 25 tons per year.

The source is willing to be subject to the most recent BACT determined for other sources in the fiberglass industry. Therefore, no BACT analysis is necessary from the source.

The Best Available Control Technology (BACT) for the Fiberglass Reinforced Plastic Production Line will be the following:

- (1) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications, including clean-up solvents shall be limited to 39.5 tons per twelve (12) consecutive months. This limit shall also make 326 IAC 2-3 not applicable.
- (2) Gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight.
- (3) Compliance with these monomer content limit shall be demonstrated on a monthly basis. If all of the gel coats used during a month meet the specified monomer content limit, maintaining records of content and usage is sufficient for demonstrating compliance. Compliance with the monomer content limit may also be demonstrated using monthly emission averaging within each gel coat application category, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limit for gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

*Units: mass = tons*

*emission factor = lbs of monomer per ton of gel coat*

*emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

- (4) The gel coat application shall be by any of the following spray technologies: non-atomized spray application technology, air assisted airless, airless, High Volume Low Pressure (HVLP) , and equivalent emission reduction technologies.
- (5) Work practices standards shall be implemented as follows:
  - (A) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
  - (B) Except for mixing containers as described in item (G), VOC containing materials shall be kept in a closed container when not in use.
  - (C) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
  - (D) Solvent collection containers shall be kept closed when not in use.
  - (E) Clean-up rags with solvent shall be stored in closed containers.

- (F) Closed containers shall be used for the storage of the following:
- (i) All production and tooling gel coats that contain HAPs,
  - (ii) All production and tooling resins that contain HAPs,
  - (iii) Waste resins and gel coats that contain HAPs
  - (iv) Cleaning materials, including waste cleaning materials,
  - (v) Other materials that contain HAPs.
- (G) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) New Gelcoat Booth  
The new Gelcoat Booth is subject to 326 IAC 6-3-2, and shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to the following:
- The Permittee shall operate the control device in accordance with manufacturer's specifications.
- The source is in compliance with this rule, as dry filters will be installed to control PM overspray emissions from the new Gelcoat operation.
- (2) Sanding / Grinding Booth  
The process weight rate from the existing Sanding and Grinding Booth which is being affected by this modification will stay the same at 1,250 pounds per hour, therefore the PM allowable will remain at 2.99 pounds per hour. This allowable was determine using the following equation:
- 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The particulate matter (PM) from the sanding and grinding booth (C-2) shall be limited by the following:
- Interpolation and extrapolation 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:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$
- The dry filter shall be in operation at all times the sanding and grinding booth is in operation, in order to comply with this limit.

#### Changes to the Part 70 Permit

The Part 70 Permit will be modified to incorporate the new Fiberglass Reinforced Plastic Production Line 2 and its applicable requirements (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

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

~~(a) Records of all required monitoring data 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 and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

~~(b) \_\_\_\_\_ Records of required monitoring information shall include, where applicable:~~

- ~~(1) \_\_\_\_\_ The date, place, and time of sampling or measurements;~~
- ~~(2) \_\_\_\_\_ The dates analyses were performed;~~
- ~~(3) \_\_\_\_\_ The company or entity performing the analyses;~~
- ~~(4) \_\_\_\_\_ The analytic techniques or methods used;~~
- ~~(5) \_\_\_\_\_ The results of such analyses; and~~
- ~~(6) \_\_\_\_\_ The operating conditions existing at the time of sampling or \_\_\_\_\_ measurement.~~

~~(c) \_\_\_\_\_ Support information shall include, where applicable:~~

- ~~(1) \_\_\_\_\_ Copies of all reports required by this permit;~~
- ~~(2) \_\_\_\_\_ All original strip chart recordings for continuous monitoring instrumentation;~~
- ~~(3) \_\_\_\_\_ All calibration and maintenance records;~~
- ~~(4) \_\_\_\_\_ Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

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

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

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm), the Permittee shall comply with following:
- (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The 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 Management  
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, OAM, on or before the date it is due.~~
- ~~(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g) 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.~~

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, *on* or before the date it is due.**
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual 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, unless otherwise specified in this permit. For the**

**purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.**

- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and 326 IAC 2-3-1 (qq) for that regulated NSR pollutant, and**
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) The name, address, and telephone number of the major stationary source.**
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
  - (4) Any other information that the Permittee deems fit to include in this report,**

**Reports required in this part shall be submitted to:**

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

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

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The Permittee owns and operates a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

Responsible Official:	Kathy Miller
Source Address:	57755 Holiday Place, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 1867, Elkhart, Indiana 46515
General Source Phone Number:	(574) 293-3840

SIC Code: 3089  
County Location: Elkhart  
Source Location Status: **Nonattainment for ozone under the 8-hour standard**  
Attainment for all **other** criteria pollutants  
Source Status: Part 70 Permit Program  
~~Source, under PSD and Major Source under~~  
Nonattainment NSR  
Major Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

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

- 
- (a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gel coat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gel coat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.
- (b) One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gel coat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.**
- This new production line 2 will utilize the existing sanding/grinding booth.**
- ~~(b)~~(c) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.
- ~~(c)~~(d) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.
- ~~(d)~~(e) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.
- ~~(e)~~ (f) One sanding / grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a dust collector with a particulate matter control efficiency of 99%, exhausting inside the building.

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

- (a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gel coat guns (GG-01 and GG-02) for gel and catalyst application, two (2) FIT chop guns (CG-01 and CG-02), and two (2) HVLP chop guns (CG-03 and CG-04) for resin and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gel coat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.
- (b) **One (1) Fiberglass Reinforced Plastic Production Line 2 with maximum rated capacity of 8 units per hour. This production line includes one (1) open molding gel coat booth, identified as GG-03, equipped with High Volume Low Pressure (HVLP) gun, with PM overspray controlled by dry filters; one (1) resin closed molding lamination process; and one (1) mold cleaning operation.**
- This new production line will utilize the existing sanding and grinding booth.**
- ~~(b)~~(c) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.
- ~~(c)~~(d) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.
- ~~(d)~~(e) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.
- ~~(e)~~ (f) One sanding / grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a dust collector with a particulate matter control efficiency of 99%, exhausting inside the building.

(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 (VOC) [326 IAC 8-1-6]**

- (a) Pursuant to CP 039-4439-00067, issued May 30, 1996, and 326 IAC 8-1-6 (New facilities; general reduction requirements), compliance for the fiberglass reinforced plastic manufacturing operations (B5, B6, and B7), surface coating operations (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall be accomplished by the following:
- ~~(a)~~ (1) All booths shall utilize Fluid Impingement Technology (FIT) or high volume low pressure (HVLP) spray applicators at all times for gel coat and chop operations;
- ~~(b)~~ (2) The average styrene concentration in the resin used in the chop coat booths and the gel coat booths shall not exceed 40%;

- (c) (3) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75%; and,
  - (c) (4) Acetone shall be used to clean spray guns used from spray coating of gel coat and resins. Lacquer thinner shall be used to clean spray guns used from surface coating and touch-up painting.
- (b) Pursuant to 326 IAC 8-1-6, the new Fiberglass Reinforced Plastic Production Line 2 Best Available Control Technology (BACT) shall be the following:
- (1) The use of resins, gel coats, including clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the VOC potential emissions from the new Fiberglass Reinforced Plastic Production Line 2 shall be limited to 39.5 tons per 12 consecutive month period with compliance determined at the end of each month.
  - (2) Gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight.
  - (3) Compliance with these monomer content limit shall be demonstrated on a monthly basis. If all of the gel coats used during a month meet the specified monomer content limit, maintaining records of content and usage as specified in Condition D.1.11 is sufficient for demonstrating compliance. Compliance with the monomer content limit may also be demonstrated using monthly emission averaging within each gel coat application category, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limit for gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

- (4) The gel coat application shall be by any of the following spray technologies: non-atomized spray application technology, air assisted airless, airless, High Volume Low Pressure (HVLP), and equivalent emission reduction technologies.

**High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.**

- (5) Work practices standards shall be implemented as follows:**
- (A) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.**
  - (B) Except for mixing containers as described in item (G), VOC containing materials shall be kept in a closed container when not in use.**
  - (C) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.**
  - (D) Solvent collection containers shall be kept closed when not in use.**
  - (E) Clean-up rags with solvent shall be stored in closed containers.**
  - (F) Closed containers shall be used for the storage of the following:**
    - (i) All production and tooling gel coats that contain HAPs,**
    - (ii) All production and tooling resins that contain HAPs,**
    - (iii) Waste resins and gel coats that contain HAPs**
    - (iv) Cleaning materials, including waste cleaning materials,**
    - (v) Other materials that contain HAPs.**
  - (G) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.**

**D.1.2 Emission Offset Minor Limit [326 IAC 2-3]**

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Pursuant to 326 IAC 2-3, the use of resins, gel coats, including clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the VOC potential to emit from the new Fiberglass Reinforced Plastic Production Line 2 shall be limited to 39.5 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC, Emission Offset not applicable and shall satisfy the BACT VOC emission limit in D.1.1 (b).

**D.1.2-3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

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Pursuant to CP-039-4439-00067, issued on May 30, 1996, use of resins, gel coats, dilution solvents, cleaning solvents, coatings, waxes, and fillers for fiberglass operations, miscellaneous operations, surface coating, and insignificant activities shall be limited such that the potential to emit (PTE) VOC from these materials shall be less than 250 tons per twelve (12) consecutive months. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12

consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit for the resins and gel coats shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, ~~OAM~~ **OAQ**.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, ~~OAM~~ **OAQ**: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

**D.1.3 4 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52, Subpart P]**

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- (a) Pursuant to CP-039-4439-00067, issued on May 30, 1996, the PM from the three (3) fiberglass reinforced plastic component manufacturing booths (B5, B6, and B7), two (2) surface coating booths (B1 and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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 40 CFR 52, Subpart P, the particulate matter emission from the new Fiberglass Reinforced Plastic Production Line's Gel coat Booth, GG-03 shall not exceed the pound per hour emission rate established as E in the following formula:

**Interpolation and extrapolation 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:**

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

**D.1-4 5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1-5 6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require

compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1(b), D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.1.67 Volatile Organic Compounds (VOC)**

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Compliance with the monomer content and usage limitation contained in Conditions D.1.1(b), D.1.2, and D.1.3 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. IDEM, ~~OAM~~ **OAQ**, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.1.78 VOC Emissions**

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

#### **D.1.89 Particulate Matter (PM)**

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- (a) The dry filters for PM control shall be in operation at all times when the surface coating operations (B1 and B8) and fiberglass reinforced plastic component manufacturing operations (B5, B6, and B7) are in operation.
- (b) **Pursuant to 326 IAC 6-3-2, the new Gel coat Booth, GG-03 shall be controlled by a dry filter, waterwash, or an equivalent control device, and the owner or operator shall operate the control device in accordance with manufacturer's specifications.**

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

##### **D.1.910 Monitoring**

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- (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 fiberglass reinforced plastic component manufacturing operations stacks (F7, F8, F9, and F10) and the surface coating booth stacks (F1 and F11) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the particulate matter emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plans for these units 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 Plans shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.1.10 11 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(b) ~~and~~ Condition D.1.2, **and Condition D.1.3**, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the monomer content limit established in Condition D.1.1 (b) and the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(b) ~~and~~ Condition D.1.2, **and Condition D.1.3**.
- (1) The amount and VOC content of each coating material and solvent used; the usage by weight and monomer content of each resin and gel coat; and the usage by weight and VOC content of each wax, catalyst, filler/putty, and clean-up 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 average styrene concentration in the resin and gel used;
  - (4) The cleanup solvent usage for each month;
  - (5) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (6) The total VOC usage for each month; and
  - (7) The weight of VOCs emitted for each month from the fiberglass operations, surface coating operations, touch-up painting operations, spray rim process, and miscellaneous operations.
  - (8) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins and gel coats are used during that month.
- (b) **To document compliance with Condition ~~D.1.8 and D.1.9~~ D.1.10**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 12 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1(b), Condition D.1.2, and Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following Report Form will be added in the Part 70 permit:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

## OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

**Source Name:** Millennium Products, Inc. and Millennium Van Tops, Inc.  
**Source Address:** 57755 Holiday Place, Elkhart, Indiana 46517  
**Mailing Address:** P.O. Box 1867, Elkhart, Indiana 46517  
**Part 70 Permit No.:** T039-7096-00067  
**Facility:** Fiberglass Reinforced Plastic Production Line 2  
**Parameter:** Volatile Organic Compounds Emissions  
**Limit:** 39.5 tons of VOC emissions per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

No deviation occurred in this quarter.

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

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

**Attach a signed certification to complete this report.**

## Compliance Requirements

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

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

## Conclusion

The construction of this proposed Fiberglass Reinforced Plastic Production Line shall be subject to the conditions of the attached **Part 70 Significant Source Modification No. 039-19809-00067 and Significant Permit Modification No. 039-20209-00067.**

## Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Millennium Products, Inc. and Millennium Van Tops, Inc.  
Source Location: 57755 Holiday Place, Elkhart, Indiana 46517  
County: Elkhart  
SIC Code: 3089  
Operation Permit No.: T039-7096-00067  
Significant Source Mod. #: 039-19809-00067  
Significant Permit Mod. #: 039-20209-00067  
Permit Reviewer: Aida De Guzman

On February 25, 2005 the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Millennium Products, Inc. and Millennium Van Tops, Inc. had applied for a Significant Source Modification and Significant Permit Modification to construct and operate one (1) Fiberglass Reinforced Plastic Production Line 2. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM, OAQ decided to make the following changes to the permit (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

EPA stated that they had interpreted the applicability for each program (Emission Offset and PSD) based on its own definition, which means that if a source is located in a nonattainment area with potential to emit of VOC greater than 100 tons per year but less than 250 tons per year for attainment pollutant, the VOC emissions will be subject to nonattainment NSR under 326 IAC 2-3, PSD review will not be triggered since the potential to emit is less than 250 tons per year for the attainment pollutants.

Based on this explanation, the Significant Source Modification 039-19809-00067 and Significant Permit Modification 039-20209-00067 will be revised as follows:

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

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The Permittee owns and operates a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

Responsible Official: Kathy Miller  
Source Address: 57755 Holiday Place, Elkhart, Indiana 46517  
Mailing Address: P.O. Box 1867, Elkhart, Indiana 46515  
General Source Phone Number: (574) 293-3840  
SIC Code: 3089  
County Location: Elkhart  
Source Location Status: Nonattainment for ozone under the 8-hour standard  
Attainment for all other criteria pollutants

Source Status:

Part 70 Permit Program  
Major Source under Emission Offset ~~and PSD~~  
**Minor Source under PSD**  
Major Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

IDEM, OAQ prefers not to change the Technical Support Document because the TSD preserves the original information and integrity of the permitting process. This TSD Addendum acknowledges that the correction in Section A.1 of the permit modification should also be reflected in the original TSD.