



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: March 4, 2005
RE: Topp Industries, Inc. / SSM 049-20354-00018
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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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March 4, 2005

Mr. Kevin Birchmeier
Topp Industries, Inc.
P. O. Box 420
Rochester, Indiana 46975

Re: 049-20354
First Significant Source Modification to
Part 70 Permit No.: 049-9015-00018

Dear Mr. Birchmeier:

Topp Industries, Inc. was issued a Part 70 permit on May 31, 2001, for the operation of fiberglass reinforced plastics tank and related sewer parts manufacturing operation. An application to modify the source was received by the Office of Air Quality (OAQ) on November 8, 2004. Pursuant to the provisions of 326 IAC 2-7-10.5, a significant source modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is as follows:

- (a) construction of one (1) fiberglass winding unit, to be constructed by 2005, using a combination of dry filament winding and resin impingement gun, coating a maximum of 60.18 plastic tank mold units per hour, with dry filters for particulate matter (PM) overspray control, exhausting to stack V-7.

The following construction conditions shall apply:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the one (1) fiberglass winding unit. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gaurav Shil, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3259, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments
GS / EVP

cc: File - Fulton County
U.S. EPA, Region V
Fulton County Health Department
Air Compliance Section Inspector – Greg Wingstrom
Compliance Data Section - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Topp Industries, Inc.
Highway 25 North
Rochester, Indiana 46975**

(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.

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

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.: T049-9015-00018	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 31, 2001 Expiration Date: May 31, 2006
First Administrative Amendment No. : T049-14806-00018	Issuance Date: September 19, 2001
Second Administrative Amendment No. : T049-17294-00018	Issuance Date: September 18, 2003

First Significant Source Modification No.:049-20354-00018	Pages Affected: 2, 3, 4, 17, 26 to 32 Pages added: 3a, 32a, 32b, 32c, 32d, 32e, 32f
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 4, 2005

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fiberglass reinforced plastics tank and related sewer parts manufacturing operation.

Responsible Official:	Kevin Birchmeier
Source Address:	Highway 25 North, Rochester, Indiana 46975
Mailing Address:	P.O. Box 420, Rochester, Indiana 46975
SIC Code:	3089
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
 - (1) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
 - (2) one (1) resin application area consisting of six (6) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 361.1 plastic tank mold units per hour. The spray application units are located in:
 - (A) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (B) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).

SECTION B

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
- (1) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
 - (2) one (1) resin application area consisting of six (6) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 361.1 plastic tank mold units per hour. The spray application units are located in:
 - (A) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (B) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).
- (b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
- (1) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;
 - (2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
 - (3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

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

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

D.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW][326 IAC 20]

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

- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:
- (1) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
 - (A) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
 - (B) one (1) resin application area consisting of six (6) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 361.1 plastic tank mold units per hour. The spray application units are located in:
 - (i) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (ii) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).
- (c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.

D.1.3 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
 - (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
 - (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
 - (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.

- (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

and

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

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

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

Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the gel coat spray booth and the resin application area shall be the following:

- (a) 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 shall be limited to 99 tons per twelve (12) consecutive months.
 - (1) Potential VOC emissions from the use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in the FRP tank production process are less than 99 tons per year. Any change or modification that would increase the potential VOC emissions from the FRP tank production process to greater than 99 tons per year shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.
- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other

techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, 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 limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin or } <37\% \text{ gel coat, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, impingement guns, pressure-feed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at alltimes. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that 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.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.5 HAP Emission Standards [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as specified in following condition D.1.5 (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.18 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in table above by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device. The source shall demonstrate that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3 (a) through (c). This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For averaging within a category:

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

where M_R = Total monthly mass of material within each category
 E_{Ma} = Emission factor for each material based on allowable monomer content and allowable application method for each category
 E_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 resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging

(b) The following categories of materials in the table above shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion-resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in paragraph (b) above, gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).

- (5) Equivalent emission reduction technologies to paragraphs (2) through (4) above.
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (e) To determine emission estimates, the following references or methods shall be used:
 - (1) Unified Emission Factors for Open Molding of Composites", July 2001, except use of controlled spray emission factors must be approved by the commissioner.
 - (2) Compilation of Emission Factors", AP-42 Volume 1, Fifth Edition, and supplements, January 1995, except hand and spray layup operations emission factors must be calculated using emission factors referenced in paragraph (1) or site-specific values using information in subdivision (3).
 - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to OAQ and the U.S. EPA.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth in the paint room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.7 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the gel coat spray booth, the resin application area, and the paint spray booth in the paint room, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) The particulate matter (PM) from the cutting and grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

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

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

D.1.9 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (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), HAP 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:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials
 - (5) 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.1.10 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in paragraph (f) below are maintained, all personnel shall be given refresher training annually.

- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from paragraph (a) above if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

Compliance Determination Requirements

D.1.11 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]

Compliance with the HAP monomer content limitations in condition D.1.5 shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (C) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance.

D.1.12 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.13 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in Condition D.1.18.

D.1.14 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel coat spray booth, the equipment of the resin application area, and the paint spray booth are in operation.

D.1.15 Volatile Organic Compounds (VOC)

- (a) 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 shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
- (1) 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.
 - (2) 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 update, 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.
- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.18 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, 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 limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin or } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel coat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

D.1.16 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat spray booth, the two (2) resin chop spray booths, the winding room, and the paint spray booth stacks (V1, V2, V3, V4, V5, V6 and V7) 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 coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance 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.1.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.
- (c) The significant permit modification application shall be submitted to:

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

D.1.18 Record Keeping Requirements [326 IAC 20-25-6(b)][326 IAC 20-25-8]

- (a) To document compliance with Conditions D.1.4 and D.1.6, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4 and D.1.6.
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin used in the gel coat spray booth and resin application area. The amount and VOC content of each solvent used shall also be recorded. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The amount and VOC content of each coating material and solvent used in the paint spray booth. 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;
 - (3) A log of the dates of use in each booth;
 - (4) The volume weighted VOC content of the coatings used in the paint spray booth for each day that coatings with a VOC content greater than 3.5 pounds per gallon are used;
 - (5) The cleanup solvent usage for each month;
 - (6) The total VOC usage for each month;
 - (7) The monomer content of resins and gel coats shall be calculated on a neat basis, i.e., excluding any filler, for each month in which noncompliant resins and gel coats are used; and
 - (8) The weight of VOCs emitted for each compliance period.
 - (A) VOC emissions from the gel coat spray booth and the resin application area 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 update, 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.
 - (C) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.16. Monthly purchase orders, invoices and material safety data sheets (MSDS) shall be sufficient to allow calculation of monthly VOC emissions from the FRP process.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Examples of such records include but are not limited to:
- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
 - (2) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
 - (4) Records of all information, including all reports and notifications required by 326 IAC 20-25.
- (c) To document compliance with Condition D.1.16, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements [326 IAC 20-25-7]

A quarterly summary of the information to document compliance with Conditions D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Topp Industries, Inc.
Source Location:	Highway 25 North, Rochester, Indiana 46975
County:	Fulton
SIC Code:	3089
Operation Permit No.:	T049-9015-00018
Operation Permit Issuance Date:	May 31, 2001
Significant Source Modification No.:	049-20354-00018
Significant Permit Modification No.:	049-19887-00018
Permit Reviewer:	Gaurav Shil/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit modification application from Topp Industries, Inc. relating to the construction and the operation of the following emission units and pollution control devices:

- (a) One (1) fiberglass winding unit, to be constructed by 2005, using a combination of dry filament winding and resin impingement gun, coating a maximum of 60.18 plastic tank mold units per hour, with dry filters for particulate matter (PM) overspray control, exhausting to stack V-7.

Explanation of Modification Requested

On November 8, 2004, Topp Industries, Inc. submitted a request to add one (1) fiberglass winding unit to the existing fiberglass reinforced plastic (FRP) tank production process. The proposed winding unit will be installed and operated in the winding room in the resin application area. This modification will increase the production rate of the resin application area to 361 mold units per hour. The proposed unit will work by using combination of dry filament winding and resin impingement guns to construct the body of the tank. The winding unit will have potential VOC emissions of 12.80 tons per year and potential Styrene (single HAP) emissions of 10.14 tons per year. The Permittee shall continue to comply with the 326 IAC 8-1-6 BACT VOC limit of ninety-nine (99) tons per year for the resin application area, as required in the current Part 70 permit.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) T049-9015-00018 issued on May 31, 2001;
- (b) First administrative amendment no. 049-14806-00018 issued on September 19, 2001; and
- (c) Second administrative amendment no. 049-17294-00018 issued on September 18, 2003.

Enforcement Issue

There are no enforcement actions with the equipment proposed in the modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
V-7	Fiberglass winding unit mandrel stack	24	20	4,000	70

Recommendation

The staff recommends to the Commissioner that the 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 8, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 through 3).

Potential To Emit Before Controls (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.”

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	12.80
CO	0.00
NO _x	0.00
HAPs	10.24

Justification for Modification

The Title V permit is being modified through a Significant Source Modification and Significant Permit Modification. This modification has a potential to emit greater than ten (10) tons per year (10.14 tons per year) of a single hazardous air pollutant (Styrene). Therefore, pursuant to 326 IAC 2-7-10.5 (f)(6) the modification shall be processed in accordance with the procedures in 326 IAC 2-7-10.5 (g).

County Attainment Status

The source is located in Fulton County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Fulton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Less than 250
VOC	Less than 250
CO	Less than 250
NO _x	Less than 250

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the technical support document for Part 70 No. 049-9015-00018.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Fiberglass winding unit	-	-	-	12.80	-	-	10.14	10.24
Total Modification Emissions	-	-	-	12.80	-	-	10.14	10.24
PSD Significant Modification Thresholds	250	250	250	250	250	250	N/A	N/A

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source will remain a minor stationary source after the modification since the source wide potential emissions of each attainment regulated pollutant shall be less than 250 tons per year.

Federal Rule Applicability

- (a) The requirements of no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are included in the permit for this modification.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20 (40 CFR Part 63.5800 through 63.5935 Subpart WWWW) are included in the permit because the source operates a fiberglass parts manufacturing facilities and is a major source of HAP emissions that uses resin and gel coats that contain styrene to produce plastic composites.

Pursuant to 40 CFR 63, Subpart WWWW, and 326 IAC 20-25-3, the fiberglass reinforced plastic tank production processes are subject to the following conditions:

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, 2006.
 - (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls of the applicable regulated air pollutant equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued Part 70 permit no. T049-9015-00018 on May 31, 2001. The new fiberglass winding unit has uncontrolled PTE of Styrene at greater than 100 percent of the applicable major Part 70 threshold for a single hazardous air pollutant i.e. ten (10) tons per year. However, the unit is not subject to an emission limitation or standard for the applicable regulated air pollutant. Moreover, the winding unit is subject to the requirements of 40 CFR 63, Subpart WWWW, which are section 112 emission limits established after November 15, 1990. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, do not apply to this modification.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

This modification to an existing minor stationary source is not major because the source, which is not one of the 28 listed source categories, does not have the potential to emit of 250 tons per year or more of any criteria pollutant. The source will remain a minor stationary source after the modification since the source wide potential emissions of each attainment regulated pollutant shall be less than 250 tons per year. Therefore, the PSD requirements will continue to not apply.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to a major source of HAPs specifically regulated by Section 112(d) of the Clean Air Act. Since the facilities at this source are regulated by Section 112(d) (i.e., 40 CFR 63, Subpart WWWW), the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this modification or to this source.

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

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year, not regulated by other provisions of Article 8. The potential VOC emissions from the new winding unit at the existing fiberglass reinforced plastics tank and related sewer parts manufacturing source shall be 12.80 tons per year. Therefore, the requirements of 326 IAC 8-1-6 shall not apply to this modification.

326 IAC 20-25 (HAP Emission Standards for Reinforced Plastics Composites Fabricating Emission Units)

This rule applies to sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, and that meet all of the following criteria:

- (1) Manufacture reinforced plastics composites parts, products, or watercraft.
- (2) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.
- (3) Have actual emissions of styrene equal to or greater than three (3) tons per year.

The potential emissions from the source (including this modification) are greater than ten (10) tons per year of single hazardous air pollutant (HAP) and twenty-five (25) tons per year of combination of HAPs. The source manufactures reinforced plastics composites parts, products, or watercraft, has an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process, and has actual emissions of styrene greater than three (3) tons per year. Therefore, 326 IAC 20-25 shall apply to this modification and to this source.

Pursuant to 326 IAC 20-25-3, the owners or operators of the fiberglass operation shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as specified in following paragraph (b) and condition D.1.5 (b) in the permit.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.18 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in table above by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device. The source shall demonstrate that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3 (a) through (c). This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For averaging within a category:

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

where M_R = Total monthly mass of material within each category
 E_{Ma} = Emission factor for each material based on allowable monomer content and allowable application method for each category
 E_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 resin or gel coat
 emissions = lbs of monomer

Note: Fillers may not be included when averaging

- (b) The following categories of materials in the table above shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion-resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in paragraph (b) above, gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to paragraphs (2) through (4) above.
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

- (e) To determine emission estimates, the following references or methods shall be used:
- (1) "Unified Emission Factors for Open Molding of Composites", July 2001, except use of controlled spray emission factors must be approved by the commissioner.
 - (2) "Compilation of Emission Factors", AP-42 Volume 1, Fifth Edition, and supplements, January 1995, except hand and spray layup operations emission factors must be calculated using emission factors referenced in paragraph (1) or site-specific values using information in subdivision (3).
 - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to OAQ and the U.S. EPA.

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (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), HAP 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:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) 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.

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in paragraph (f) below are maintained, all personnel shall be given refresher training annually.

- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from paragraph (a) above if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

Pursuant to 326 IAC 20-25-5 compliance with the HAP monomer content and usage limitations shall be determined using one (1) of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A, shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (C) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with this rule.

Pursuant to 326 IAC 20-25-6 on and after January 1, 2002, each owner or operator of a source or emission unit shall maintain records that are complete and sufficient to establish compliance with the requirements of this rule. Examples of such records are as follows:

- (1) Purchase orders.
- (2) Invoices.

- (3) Material safety data sheets (MSDS).
- (4) Manufacturer's certified product data sheets.
- (5) Calculations.
- (6) Other records to confirm compliance.

The owner or operator shall maintain records of all information, including all reports and notifications required by this rule. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

Pursuant to 326 IAC 20-25-7 the owner or operator of the source subject to this rule shall submit an initial notification report to IDEM, OAQ on or before June 1, 2001. The notification report shall include all of the following:

- (1) Name and address of the owner or operator.
- (2) Address of the physical location of the source.
- (3) Statement verifying that the source is subject to the rule signed by a responsible official as set forth in 326 IAC 2-7-1(34).

The owner or operator of a source subject to this rule shall also submit an initial statement of compliance to IDEM, OAQ on or before March 1, 2002. The initial statement of compliance shall include all of the following:

- (1) Name and address of the owner or operator.
- (2) Address of the physical location.
- (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

The source submitted the initial notification report to IDEM, OAQ in November 2001 and initial statement of compliance on March 1, 2002.

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.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T049-9015-00018). In addition to the changes specified below revisions are made to the Table of Contents and condition numbers pursuant to addition of new conditions without replication herein.

1. Section A.2, Emission Units and Pollution Control Equipment Summary and the Section D.1 facility description box are revised to reflect the addition of the new winding unit and the description changes:

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

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

- (a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
- (2) one (1) resin application area consisting of ~~five (5)~~ **six (6)** non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of ~~300.9~~ **361.1** plastic tank mold units per hour. The spray application units are located in:
 - (A) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (B) one (1) winding room, **initially** constructed in 1992 **and modified in 2004**, with dry filters for particulate matter (PM) overspray control, exhausting at ~~two (2)~~ **three (3)** stacks (ID Nos. V4, ~~and V5~~ **and V7**).

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
.....
- (2) one (1) resin application area consisting of ~~five (5)~~ **six (6)** non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of ~~300.9~~ **361.1** plastic tank mold units per hour. The spray application units are located in:
 - (A) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (B) one (1) winding room, **initially** constructed in 1992 **and modified in 2004**, with dry filters for particulate matter (PM) overspray control, exhausting at ~~two (2)~~ **three (3)** stacks (ID Nos. V4, ~~and V5~~ **and V7**).

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

2. The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20 (40 CFR Part 63.5800 through 63.5935 Subpart WWWW) are included in the permit for the fiberglass reinforced plastic tank production process. The following conditions are included in Section D.1, Facility Operation Conditions:

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

D.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW][326 IAC 20]

- (a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to this condition.
- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:
- (1) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
- (A) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
- (B) one (1) resin application area consisting of six (6) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 361.1 plastic tank mold units per hour. The spray application units are located in:
- (i) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
- (ii) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).

- (c) **The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.**

D.1.3 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:
- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
 - (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
 - (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
 - (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

and

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

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

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

D.1.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.
- (c) The significant permit modification application shall be submitted to:

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

3. The requirements of the 326 IAC 20-25 (HAP Emission Standards for Reinforced Plastics Composites Fabricating Emission Units) are included in the permit for this modification and the source. The following conditions are included in Section D.1, Facility Operation Conditions:

D.1.5 HAP Emission Standards [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as specified in following condition D.1.5 (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.18 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in table above by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spraying, or installing a control device. The source shall demonstrate that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3 (a) through (c). This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For averaging within a category:

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

where M_R = Total monthly mass of material within each category
 E_{Ma} = Emission factor for each material based on allowable monomer content and allowable application method for each category
 E_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 resin or gel coat
emissions = lbs of monomer*

Note: Fillers may not be included when averaging

(b) The following categories of materials in the table above shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion-resistant, unfilled resins from all sources.**
- (2) Production, specialty product resins from all sources.**

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.**

- (2) **Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.**
- (3) **Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.**

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) **Unless specified in paragraph (b) above, gel coat application and mechanical application of resins shall be by any of the following spray technologies:**
 - (1) **Nonatomized application technology.**
 - (2) **Air-assisted airless.**
 - (3) **Airless.**
 - (4) **High volume, low pressure (HVLP).**
 - (5) **Equivalent emission reduction technologies to paragraphs (2) through (4) above.**
- (d) **The following cleaning operation standards for resin and gel coat application equipment shall apply:**
 - (1) **For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.**
 - (2) **A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.**
 - (3) **Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.**
- (e) **To determine emission estimates, the following references or methods shall be used:**
 - (1) **"Unified Emission Factors for Open Molding of Composites", July 2001, except use of controlled spray emission factors must be approved by the commissioner.**
 - (2) **"Compilation of Emission Factors", AP-42 Volume 1, Fifth Edition, and supplements, January 1995, except hand and spray layup operations**

emission factors must be calculated using emission factors referenced in paragraph (1) or site-specific values using information in subdivision (3).

- (3) **Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to OAQ and the U.S. EPA.**

D.1.9 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (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), HAP 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:**
 - (1) **All production and tooling resins that contain HAPs.**
 - (2) **All production and tooling gel coats that contain HAPs.**
 - (3) **Waste resins and gel coats that contain HAPs.**
 - (4) **Cleaning materials, including waste cleaning materials.**
 - (5) **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.1.10 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) **All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.**
- (b) **All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.**
- (c) **To ensure training goals listed in paragraph (f) below are maintained, all personnel shall be given refresher training annually.**
- (d) **Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from paragraph (a) above if written documentation that the**

employee's training is current is provided to the new employer.

- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.**
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:**
 - (1) Appropriate application techniques.**
 - (2) Appropriate equipment cleaning procedures.**
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.**
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:**
 - (1) A copy of the current training program.**
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**

Compliance Determination Requirements

D.1.11 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]

Compliance with the HAP monomer content limitations in condition D.1.5 shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.**
- (2) The manufacturer's material safety data sheet.**
- (3) Sampling and analysis, using any of the following test methods, as applicable:**
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.**
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.**
 - (C) Upon written application by the source, the commissioner may approve an alternative test method.**

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance.

D.1.19 Reporting Requirements [326 IAC 20-25-7]

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the quarter being reported.

4. Condition D.1.5, Volatile Organic Compounds (VOC), Condition D.1.6, VOC Emissions, and Condition D.1.8 (b), Volatile Organic Compounds (VOC), are revised to include the recent condition references. Pursuant to this modification, Conditions D.1.5, D.1.6 and D.1.8 are now designated as D.1.12, D.1.13, and D.1.15, respectively:

Compliance Determination Requirements

D.1.512 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.26 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.613 VOC Emissions

Compliance with Condition D.1.44 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in Condition D.1.4018.

D.1.815 Volatile Organic Compounds (VOC)

-
- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.4018 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

5. Condition D.1.9, Monitoring, is revised to include the new stack, identified as V7, in the monitoring requirement of weekly observations of the overspray from the winding room. Pursuant to this modification, Conditions D.1.9 is now designated as D.1.16:

D.1.916 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat spray booth, the two (2) resin chop spray booths, the winding room, and the paint spray booth stacks (V1, V2, V3, V4, V5, and V6 and V7) 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.

6. Condition D.1.10, Recordkeeping Requirements, is revised to include the recent condition references. Pursuant to 326 IAC 20-25 (HAP Emission Standards for Reinforced Plastics Composites Fabricating Emission Units), the recordkeeping requirements are included as paragraph (b) of the following condition in order to comply with the standards of 326 IAC 20-25. Pursuant to this modification, Conditions D.1.10 is now designated as D.1.19:

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

D.1.4018 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.44 and D.1.26, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.44 and D.1.26.
.....

- (b) **To document compliance with Condition D.1.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Examples of such records include but are not limited to:**
 - (1) **The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;**
 - (2) **Method of application and other emission reduction techniques for each resin and gel coat used;**
 - (3) **Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.**
 - (4) **Records of all information, including all reports and notifications required by 326 IAC 20-25.**

- (c) To document compliance with Condition D.1.916, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Conclusion

The construction and operation of fiberglass winding unit shall be subject to the conditions of the attached proposed Significant Source Modification No.:049-20354-00018 and Significant Permit Modification No.: 049-19887-00018.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Topp Industries, Inc.
Source Location:	Highway 25 North, Rochester, Indiana 46975
County:	Fulton
SIC Code:	3089
Operation Permit No.:	T049-9015-00018
Operation Permit Issuance Date:	May 31, 2001
Significant Source Modification No.:	049-20354-00018
Significant Permit Modification No.:	049-19887-00018
Permit Reviewer:	Gaurav Shil/EVP

On January 25, 2005, the Office of Air Quality (OAQ) had a notice published in the Rochester Sentinel, Rochester, IN stating that Topp Industries, Inc. had applied for a significant source and significant permit modification to Part 70 permit no. T049-9015-00018 to construct and operate one (1) fiberglass winding unit at the existing fiberglass reinforced plastic (FRP) tank production process. 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.

No comments were received on the proposed permit. However, upon further consideration, IDEM, OAQ has decided to make changes to the permit as indicated below. Changes made to the permit are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents and formatting changes are also made without replication herein.

1. Condition B.25, Term of Conditions, is included in the permit:

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**
- (b) the emission unit to which the condition pertains permanently ceases operation.**

Appendix A: Emission Calculations Summary

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Part 70 SSM No.: 049-20354
Part 70 SPM No.: 049-19887
Plt ID: 049-00018
Reviewer: Gaurav Shi/EVP
Date: 03/04/05

Uncontrolled Potential Emissions (tons/year) (including modification)				
Emissions Generating Activity				
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	TOTAL
PM	8.05	8.12	6.80	22.97
PM10	8.05	8.12	4.50	20.67
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	84.96	11.82	0.00	96.78
CO	0.00	0.00	0.00	0.00
total HAPs	79.46	2.27	0.00	81.73
worst case single HAP	(Styrene) 79.31	(Xylene) 1.63	0.00	(Styrene) 79.31
Controlled Potential Emissions (tons/year) (including modification)				
Emissions Generating Activity				
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	TOTAL
PM	0.11	0.11	0.10	0.32
PM10	0.11	0.11	0.06	0.28
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	84.96	11.82	0.00	96.78
CO	0.00	0.00	0.00	0.00
total HAPs	79.46	2.27	0.00	81.73
worst case single HAP	(Styrene) 79.31	(Xylene) 1.63	0.00	(Styrene) 79.31
Total emissions based on rated capacity at 8,760 hours/year, after control.				
* PM and PM-10 emissions from cutting/grinding are based on emission factors provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.				

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Fiberglass Processes**

**Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Part 70 SSM No.: 049-20354
Part 70 SPM No.: 049-19887
Pit ID: 049-00018
Reviewer: Gaurav Shi/EVP
Date: 03/04/05**

State Potential Emissions (uncontrolled):												
Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor lb emitted per ton resin/gel-coat processed	Gal of Mat (gal/unit)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Mechanical Non-Atomized and Filament Winding Resin Application - FRP Production**												
Resin (Interplastic Corporation)	9.42	35.00%	77.00	0.10600	60.18	65.00%	2.31	55.52	10.13	0.00	5.07	100.00%
Body Filler (superior)*	9.59	34.00%	89.00	0.00007	60.18	66.00%	1.8E-03	0.04	0.01	0.00	4.94	100.00%
FRP Production - Clean Up												
Acetone	6.62	0.00%	N/A	0.01800	60.18	0.00%	0.00	0.00	0.00	0.00	N/A	100.00%
FRP Production - Mold Release												
TR 210 Self Stripping Liquid Mold Release	7.20	100.00%	N/A	7.00E-06	60.18	0.00%	0.00	0.07	0.01	0.00	N/A	100.00%
TR 301 Sealer glaze	8.75	35.50%	N/A	7.00E-06	60.18	0.00%	0.00	0.03	0.01	0.00	N/A	100.00%
Partall Paste Green Wax #2	6.56	70.00%	N/A	7.00E-06	60.18	0.00%	0.00	0.05	0.01	0.00	N/A	100.00%
Paste wax (TR100 series)	7.00	75.00%	N/A	7.00E-06	60.18	0.00%	0.00	0.05	0.01	0.00	N/A	100.00%
TR 311 Super duty buffing compound	10.06	20.00%	N/A	7.00E-06	60.18	0.00%	0.00	0.02	0.00	0.00	N/A	100.00%
FRP Production - Catalyst												
Norox MEKP-9***	9.17	100.00%	N/A	0.00190	60.18	0.00%	0.60	14.34	2.62	0.00	N/A	75.00%
Total State Potential Emissions:							2.92	70.13	12.80	0.00		
Federal Potential Emissions (controlled):												
			Material Usage Limitation	Control Efficiency:			Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
				VOC	PM							
Total Federal Potential Emissions:			N/A	0.00%	98.60%		2.92	70.13	12.80	0.00		

Notes:

* The body filler is applied manually. Therefore, emission factors for manual application were used.

** The mechanical non-atomized and filament winding process is a combination of impingement gun resin layup and filament winding where resin is applied to the filaments with impingement guns as they are wound onto the mandrel. Because the resin is applied with mechanical non-atomized guns, the emission factors for mechanical non-atomized resin application were used to conservatively estimate potential emission.

*** Norox MEKP-9 consists of 45% HAP (2% MEK and 43% DMP) and 100% VOC. Only MEK (2%) flashes off. The rest is reacted and incorporated into product.

Methodology:

Potential VOC Pounds per Hour = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * Emission Factor

Potential VOC Pounds per Day = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * (24 hr/day) * Emission Factor

Potential VOC Tons per Year = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (1 ton/2000 lbs) * Emission Factor * (8760 hrs/yr) * 1 ton/2000 lbs

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Controlled VOC emission rate = uncontrolled emission rate * Material usage limitation

Controlled PM emission rate = uncontrolled emission rate * (1 - control efficiency) * Material usage limitation

Emission Factors are based on the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, July, 2001.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Part 70 SSM No.: 049-20354
Part 70 SPM No.: 049-19887
Plt ID: 049-00018
Reviewer: Gaurav Shi/EVP
Date: 03/04/05

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Emission Factor	Weight % Styrene	Weight % MEK	Weight % Toluene	Weight % Dimethyl Phthalate	Weight % Xylene	Styrene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Dimethyl Phthalate Emissions* (ton/yr)	Xylene Emissions (ton/yr)
Mechanical Non-Atomized Resin Application - FRP Production														
Resin (Interplastic Corporation)	9.42	0.10600	60.18	77.00	35.00%	0.00%	0.00%	0.00%	0.00%	10.13	0.00	0.00	0.00	0.00
Body Filler (superior)*	9.59	0.00007	60.18	89.00	31.50%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00
FRP Production - Clean Up														
Acetone	6.62	0.01800	60.18	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
FRP Production - Mold Release														
TR 210 Self Stripping Liquid Mold Release	7.20	7.00E-06	60.18	N/A	0.00%	0.00%	80.00%	0.00%	3.00%	0.00	0.00	0.01	0.00	0.00
TR 301 Sealer glaze	8.75	7.00E-06	60.18	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Partall Paste Green Wax #2	6.56	7.00E-06	60.18	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Paste wax (TR100 series)	7.00	7.00E-06	60.18	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
TR 311 Super duty buffing compound	10.06	7.00E-06	60.18	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
FRP Production - Catalyst														
Norox MEKP-9	9.17	0.0019	60.18	N/A	0.00%	2.00%	0.00%	43.00%	0.00%	0.00	0.09	0.00	0.00	0.00

Total Potential Emissions 10.14 0.09 0.01 0.00 0.00

Total HAPs (tons per year) 10.24

METHODOLOGY

* Norox MEKP-9 consists of 45% HAP (2% MEK and 43% DMP). Only MEK (2%) flashes off. The rest is reacted and incorporated into product.
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material usage limitation.