



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: July 21, 2005
RE: Ashley Industrial Molding, Inc. / SSM 033-20719-00017
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.

Mitchell E. Daniels, Jr.
Governor

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July 21, 2005

Mr. Rodney W. Schoon
Ashley Industrial Molding, Inc.
P.O. Box 398
Ashley, IN 46705

Re: **033-20719-00017**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 033-5941-00017**

Dear Mr. Schoon:

Ashley Industrial Molding, Inc. was issued Part 70 Operating Permit T 033-5941-00017 on July 31, 2001 for a high-pressure fiberglass-reinforced plastics manufacturing and painting source. An application to modify the source was received on February 7, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (w) One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission unit 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 new emission 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 contact Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments
CJF/MES

cc: File - Dekalb County
Dekalb County Health Department
Northern Regional Office
Air Compliance Section Inspector – Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

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

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

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

First Significant Source Modification 033-20719-00017	Sections Affected: A.2, D.1, Quarterly Report Form
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 21, 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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Responsible Official:	Rodney Schoon
Source Address:	320 South Wabash Avenue
Mailing Address:	320 South Wabash Avenue
General Source Phone Number:	260-587-9155
SIC Code:	3089
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

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

- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.

- (v) One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.
- (w) One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.

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

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3)
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)

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

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

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

- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1985, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.
- (v) One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.
- (w) One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.

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

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emission units comprise the affected source that is subject to 40 CFR 63, Subpart P:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (a) The potential VOC delivered to the applicators including cleanup solvents shall be limited to a total of no more than one-hundred forty nine and nine tenths (149.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) The method of application at the spray booths shall be done with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;
- (c) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except

the use of coatings with a volume percent solids of no less than 38% can be used if required by military specifications; and

- (d) The following management and work practices shall apply:
- (1) Operator training course.
 - (2) Spray gun cleaning.
 - (3) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
 - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit VOC from the nineteen (19) molding presses (PR-109, 204, 234, 346, 347, 365, 437, 440, 651, 654, 845, 1039, 1056, 1252, 2053, 2560, 3038, 3560, and DCPD-PR1) shall be limited to no more than eighty nine (89.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Compliance with the VOC emission limit in Condition D.1.4(a) shall be determined with the use of a three (3.0%) percent VOC flashoff factor for each molding press.
- (c) This VOC emission limit combined with the BACT VOC usage limit in Condition D.1.3 and the ten (10) tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

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

Pursuant to 326 IAC 6-3-2, the PM from the three (3) surface coating booths, identified as SB-1 through SB-3 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:

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

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

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to

paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements.

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

- (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.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition. except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements.
- (c) The following emissions unit comprises the affected source that is subject to 40 CFR 63, Subpart WWWW:

Closed molding;
- (d) The definitions of 40 CFR Part 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.

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

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

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.10 VOC Emissions

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

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

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) surface coating booths, identified as SB-1 through SB-3 are in operation.

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 2A, 2B and 2C 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.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.3 and D.1.4
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.12 and D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

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

D.1.15 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

- (b) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.16 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 PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 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
Indianapolis, Indiana 46204

D.1.17 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

- (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
Indianapolis, Indiana 46204

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

D.1.18 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
Indianapolis, Indiana 46204

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: Nineteen (19) Molding Presses
Parameter: VOC emissions calculated with a three (3%) percent flashoff factor
Limit: Total of 89.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Ashley Industrial Molding, Inc.
Source Location:	320 South Wabash Avenue, Ashley, Indiana 46705
County:	Dekalb
SIC Code:	3069
Operation Permit No.:	T 033-5941-00017
Operation Permit Issuance Date:	July 31, 2001
Significant Source Modification No.:	033-20719-00017
Significant Permit Modification No.:	033-20973-00017
Permit Reviewer:	Craig J. Friederich

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

One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.

History

On February 7, 2005, Ashley Industrial Molding, Inc. submitted an application to the OAQ requesting to add an additional 2,500-ton reinforced plastic molding press, identified as PR-3560, to their existing plant. Ashley Industrial Molding, Inc. was issued a Part 70 permit on July 31, 2001.

Stack Summary

There are no stacks associated with this process.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Significant Permit Modifications 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 February 7, 2005, and additional information was received on February 28, 2005.

Emission Calculations

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

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	--
PM ₁₀	--
SO ₂	--
VOC	10.8
CO	--
NO _x	--

HAPs	Potential To Emit (tons/year)
Styrene	10.8
TOTAL	10.8

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This Modification is being performed pursuant to 326 IAC 2-7-10.5(f)(6), because the potential to emit of a single hazardous air pollutant (HAP) is greater than ten (10) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 033-20793-00017) in accordance with 326 IAC 2-7-12(d)(1) because the requirements of 40 CFR 63, Subpart WWWW, are included in this modification. The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment

Pollutant	Status
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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Dekalb County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (c) Dekalb County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	26.1
PM ₁₀	26.3
SO ₂	17.9
VOC	Less than 250
CO	14.9
NO _x	23.0

- (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 twenty-eight

- (28) listed source categories.
 (b) These emissions are based upon state the Technical Support Document for 033-17813-00017.

Potential to Emit of Modification After Issuance

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

Process/facility	Potential to Emit (tons/year)					
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
Proposed Modification	--	--	--	10.8	--	--
Total Source Wide Limit	--	--	--	Less than 250	--	--
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions from this modification will be included in the existing VOC emission limit. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:
- (1) with the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants.
 - (2) that is subject to an emission limitation or standard for all criteria pollutants; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The one (1) 2,500-ton reinforced plastic molding press, identified as PR-3560 will be part of the existing affected source which is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (326 IAC 20-1-1, and 40 CFR 63, Subpart WWWW). A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification on or before July 21, 2005, which is nine (9) months prior to the compliance date for the MACT (April 21, 2006). The application will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) 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.
- (2) 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.
- (3) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

State Rule Applicability - Individual Facilities

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

The potential emissions of VOC are limited to less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

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

The potential VOC emissions from the one (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this facility. Any change or modification which would increase the potential to emit VOC from PR-3560 to twenty-five (25) tons per year or more shall require prior approval from IDEM, OAQ.

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.

There are no compliance monitoring requirements applicable to this emission unit being constructed.

Proposed Changes

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

The 2,500-ton reinforced plastic molding press, identified as PR-3560, and the one (1) compression molding press, identified as DCPD-PR1, permitted under AA 033-20041, issued February 15, 2005, have been incorporated in Section A.2 and D.1 as follows:

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

- (v) **One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD-PR1.**
- (w) **One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (v) **One (1) compression molding press, identified as DCPD-PR1, producing plastic parts at a maximum rate of ten (10) parts per hour, with all emissions exhausted through Stack V-DCPD- PR1.**
- (w) **One (1) 2,500-ton reinforced plastic molding press, identified as PR-3560, installed in 2005, capacity: 630 pounds of SMC per hour.**

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

The 2,500-ton reinforced plastic molding press, identified as PR-3560 has been added to Condition D.1.4. This press will be included in the less than eighty nine (89.0) tons of VOC per twelve (12) consecutive month period, to render the requirements of 326 IAC 2-2 not applicable. Please note press DCPD-PR1, which was constructed pursuant to Administrative Amendment 033-20041, issued February 15, 2005, has been included in the VOC limit contained in this condition, as it was not

included in AA 033-20041. The reference to the VOC emissions from the combustion units in Condition D.1.4 (c) has been removed because these units are not limited. The changes are as follows:

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit VOC from the ~~seventeen~~ **nineteen (4719)** molding presses (PR-109, 204, 234, 346, 347, 365, 437, 440, 651, 654, 845, 1039, 1056, 1252, 2053, 2560, ~~and 3038,~~ **3560, and DCPD-PR1**) shall be limited to no more than eighty nine (89.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Compliance with the VOC emission limit in Condition D.1.4(a) shall be determined with the use of a three (3.0%) percent VOC flashoff factor for each molding press.
- (c) This VOC emission limit combined with the BACT VOC usage limit in Condition D.1.3, ~~the full potential to emit VOC from the combustion units~~ and ten (10) tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

Conditions D.1.6 and D.1.7 have been added to indicate that NESHAP WWWW applies to this source. Please note all subsequent D.1 conditions have been re-numbered accordingly.

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

- (a) **The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.**
- (b) **Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements.**

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

- (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.**
- (b) **Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements.**

- (c) The following emissions unit comprises the affected source that is subject to 40 CFR 63, Subpart WWWW:

Closed molding;

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

D.1.17 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

- (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
Indianapolis, Indiana 46204

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

D.1.18 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
Indianapolis, Indiana 46204**

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into this permit as follows:

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

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

The Quarterly Report Form has been revised as follows:

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: ~~Seventeen~~ **Nineteen (1719)** Molding Presses
Parameter: VOC emissions calculated with a three (3%) percent flashoff factor
Limit: Total of 89.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-20719-00017 and Significant Permit Modification No. 033-20973-00017.

**Appendix A: Emissions Calculations
VOC, HAP and Particulate
From Closed Molding Operations**

**Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
SSM: 033-20719
Pit ID: 033-00017
Reviewer: Craig J. Friederich
Date: February 7, 2005**

Material	Weight % Monomer	Usage (lbs/hour)	Flash Off (%)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	%VOC that is Styrene	Potential Styrene Emissions (tons/yr)	Particulate Potential (tons/yr)	Transfer Efficiency
Compression Molding Presses(SMC)										
PR-3560	13.00%	630	3.0%	2.46	58.97	10.8	100%	10.8	0.00	100%
State Potential Emissions			Uncontrolled VOC:	2.46	58.97	10.8		10.8	0.00	

METHODOLOGY

Potential VOC Pounds per Hour = Pounds of material used for each part * Parts per hour * monomer content * flash off

Potential VOC Tons per Year = Potential VOC Pounds per hour * 8760 hrs/yr / 2000 lbs/ton

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

Styrene Potential Tons per Year = VOC tons per year * % VOC that is Styrene

Flash off factors are based on AP-42 Table 4.4-2 for closed molding operations