



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: May 13, 2005  
RE: Industrial Dielectric, Inc. / MSM 057-20904-00042  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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-MOD.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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**May 13, 2005**

Mr. Jay Merrell  
Industrial Dielectric, Inc.  
407 South 7<sup>th</sup> Street  
Noblesville, Indiana 46060

Re: 057-20904-00042  
Minor Source Modification to  
Part 70 No.: T 057-7683-00042

Dear Mr. Merrell:

Industrial Dielectric, Inc., located at 407 South 7<sup>th</sup> Street, Noblesville, Indiana 46060 was issued a Part 70 permit on November 3, 1999 for a fiberglass molding, lamination, and pultrusion operations. An application to modify the source was received on March 8, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) Five (5) bulk molding compound (BMC) mixers, identified as M<sub>16</sub> - M<sub>20</sub> for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B<sub>9</sub>, exhausting inside the building.
- (b) Insignificant Activities - Two (2) laboratory BMC mixers with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M<sub>16</sub> - M<sub>20</sub>.

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 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.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

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 call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments

APD

cc: File – Hamilton County  
U.S. EPA, Region V  
Hamilton County Health Department  
Air Compliance Section Inspector – Marc Goldman  
Compliance Data Section  
Administrative and Development



*Mitchell E. Daniels, Jr.*  
 Governor

*Thomas W. Easterly*  
 Commissioner

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**PART 70 MINOR SOURCE MODIFICATION  
 OFFICE OF AIR QUALITY**

**Industrial Dielectrics, Inc.  
 407 South 7<sup>th</sup> St.  
 Noblesville, Indiana 46060**

(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.

Minor Source Modification No.: T057-20904-00042	
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: May 13, 2005

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

(a) Five (5) bulk molding compound (BMC) mixers, identified as M<sub>16</sub> - M<sub>20</sub> for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B<sub>9</sub>, exhausting inside the building.

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

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

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52 Subpart]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
Mixing Line M <sub>16</sub>	0.50	2.58
Mixing Line M <sub>17</sub>	0.50	2.58
Mixing Line M <sub>18</sub>	0.50	2.58
Mixing Line M <sub>19</sub>	0.50	2.58
Mixing Line M <sub>20</sub>	0.50	2.58

The pounds per hour PM limitations shall be calculated with the following equation:

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

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

**D.1.5 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

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

**D.1.6 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. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

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

D.1.7 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

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- (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) 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.

- (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

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

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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

**Compliance Determination Requirements**

**D.1.12 Particulate Matter (PM)**

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The Baghouse B<sub>9</sub> shall be in operation at all times when any of the Bulk Molding Compound Mixing Line, identified as M<sub>16</sub> - M<sub>20</sub> is in operation in order to comply with the PM limits in Condition D.1.2.

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

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

**Source Background and Description**

Source Name:	Industrial Dielectric, Inc.
Source Location:	407 S. 7 <sup>th</sup> St., Noblesville, IN 46060
County:	Hamilton
SIC Code:	3087
Operation Permit No.:	T057-7683-00042
Operation Permit Issuance Date:	November 3, 1999
Minor Source Modification No.:	057-20904-00042
Minor Permit Modification No.:	057-20971-00042
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Industrial Dielectric, Inc., a plastic resin production plant relating to the construction of the following emission units and pollution control devices:

- (a) Five (5) bulk molding compound (BMC) mixers, identified as M<sub>16</sub> - M<sub>20</sub> for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B<sub>9</sub>, exhausting inside the building.
- (b) Insignificant Activities - Two (2) laboratory BMC mixers with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M<sub>16</sub> - M<sub>20</sub>.

**History**

On March 8, 2005, Industrial Dielectric, Inc. submitted an application to the OAQ requesting to add additional bulk molding compound mixers to their existing plant. Industrial Dielectric, Inc. was issued a Part 70 permit on November 3, 1999.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor 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 March 8, 2005.

**Emission Calculations**

See Pages 1 and 2 of 2 TSD Appendix A of this document for detailed emission 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. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	132.36
PM-10	132.36
SO <sub>2</sub>	0.0
VOC	13.12
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Styrene	7.9
Vinyl Acetate	0.003
Hexane	0.001
Worst Single HAP	7.9
Combined HAPs	7.904

**Justification for Modification**

- (a) The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8), as it is a modification that has a potential to emit greater than the thresholds for Significant Source Modification that adds emission units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission units.
- (b) The Part 70 Operating Permit is being modified through Part 70 Minor Permit Modification. This is performed pursuant to 326 IAC 2-7-12, since it is not required to be processed as a Significant Permit Modification or Administrative Amendment.

**County Attainment Status**

The source is located in Hamilton County.

Pollutant	Status
PM2.5	Nonattainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour ozone	Nonattainment

1-hour ozone	Attainment
Lead	Not determined

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Hamilton County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Hamilton County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (c) Hamilton County has been classified as attainment or unclassifiable for all the 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 and Part 70 Definition (emissions after controls taken from the issued Part 70 permit T057-7683-00042, issued on November 3, 1999; and Significant Source Modification No.: 057-18484-00042, issued on April 30, 2004):

Pollutant	SSM 057-18484-00042	T057-7683-00042	TOTAL Emissions (tons/year)
	Emissions (tons/year)	Emissions (tons/year)	
PM	0.16	4.8	4.96
PM-10	0.15	6.5	6.65
SO <sub>2</sub>	0.0	0.0	0.0
VOC	22.72	142.05 *	164.77
CO	0.0	0.06	0.06
NOx	0.0	0.5	0.5
Single HAP	21.42	26.01	47.43
Combined HAPs	21.42	>25	102.16

\* - taken from the TV spreadsheet calculations.

- (a) This existing source is a major stationary source under 326 IAC 2-3, Emission Offset rule because VOC a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) This existing source is not a major stationary source for attainment pollutants, as PM,

PM10, SO<sub>2</sub>, and CO are not emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

**Potential to Emit After Issuance of Permit**

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 <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
BMC Mixers (M16-M20)	0.13	0.13	0.0	13.12	0.0	0.0	7.9
PSD and Emission Offset Threshold Levels	250	250	250		250	100.0	-
Emission Offset Significant Levels				40.0			

- (a) This modification to an existing major stationary source is not major because the emission increase for VOC is less than the significant level of 40 tons/year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
BMC Mixers (M16-M20)	0.13	0.13	0.0	13.12	0.0	0.0	7.9
TOTAL Source PTE After Permit Issuance	5.09	6.78	0.0	177.89	0.06	0.5	110.06

**Federal Rule Applicability**

- (a) New Source Performance Standards (NSPS):  
 There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) National Emission Standards for Hazardous Air Pollutants:  
 (1) 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. The proposed Bulk Molding Compound Mixers M<sub>16</sub> through M<sub>20</sub> are subject to this NESHAP as they are located in an existing source that is major for HAPs.

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:

- (A) 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.
- (B) 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.
- (C) If complying by using an add-on control device, the Permittee shall submit:
  - (i) 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.
  - (ii) 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.
  - (iii) 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.
- (2) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

#### **State Rule Applicability – Entire Source**

- (a) 326 IAC 2-3 (Emission Offset)  
This modification to an existing major stationary source is not major because the emission increase for VOC is less than the significant level of 40 tons/year. Therefore, pursuant to

326 IAC 2-3, the Emission Offset requirements do not apply.

- (b) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability – Individual Facilities

- (a) 326 IAC 8 (Volatile Organic Sources)  
There are no specific rules in 326 IAC 8 that applies to the proposed Bulk Molding Compound Mixers M<sub>16</sub> through M<sub>20</sub>, used for fiberglass bulk molding compound production.
- (b) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state which are not otherwise regulated by other provisions in this article 326 IAC 8.

The proposed Bulk Molding Compound Mixing Lines M<sub>16</sub> through M<sub>20</sub>, are not subject to 326 IAC 8-1-6, as each mixing line has potential VOC emissions less than 25 tons per year.

- (c) 326 IAC 6-3-2 and 40CFR 52 Subpart P (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 40 CFR 52 Subpart P the particulate matter (PM) from the five (5) Bulk Molding Compound (BMC) Mixing Lines, identified as M<sub>16</sub> - M<sub>20</sub> shall be limited by 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:

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

Each Bulk Molding Compound Mixing Line, identified as M<sub>16</sub> - M<sub>20</sub> shall be limited to 2.58 pounds per hour at a process weight rate of 0.5 ton/hr (1000 pounds/hr). Baghouse, B<sub>9</sub> shall be in operation at all times when any of the Mixing Lines, M<sub>16</sub> - M<sub>20</sub> is in operation in order to comply with this rule.

- (d) 326 IAC 2-4.1-1 (New Source Toxic Control)  
This rule does not apply to the proposed Bulk Molding Compound Mixing Lines, M<sub>16</sub> through M<sub>20</sub> as these mixing lines would be subject to the NESHAP, Subpart WWWW: Reinforced Plastic Composites Production.

### 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 to the Part 70 Permit

Note: Additions to the Part 70 are **bolded** and deletions are ~~struck through~~ for emphasis.

(1) Section A.1 will be modified to update Hamilton County's status:

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

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The Permittee owns and operates a stationary plastic and plastic resin production plant that operates fiberglass molding, lamination, and pultrusion facilities and that produces a bulk molding compound, plastic sheets, and plastic component parts.

Responsible Official: Jay Merrell  
Source Address: 407 S. 7<sup>th</sup> St., Noblesville, IN  
Mailing Address: P. O. Box 357 Noblesville, IN 46060  
Phone Number: 17 / 773 - 1766  
SIC Code: 3087  
County Location: Hamilton  
County Status: **Nonattainment for 8-hour Ozone**  
**Nonattainment for PM2.5**  
Attainment for all **the other** criteria pollutants  
Source Status: Part 70 Permit Program  
**Major Source, under Emission Offset Rules**  
~~Minor Source, under PSD or Emission Offset Rules~~  
Major Source, Section 112 of the Clean Air Act

(2) Section A.2 of the Part 70 permit will be modified to incorporate the change as follows:

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

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

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.
- (b) One plastic sander, identified as SN<sub>1</sub> for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B<sub>3</sub>, and exhausting to stack S<sub>1</sub>.
- (c) Two mixers, identified as M<sub>1</sub> and M<sub>2</sub>, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>2</sub>.
- (d) One (1) sheet molding compound mixer, identified as SMC Mixers M<sub>3</sub>, for sheet molding compound production with increase in maximum throughput from 313 pounds per hour to

1,200 pounds per hour, exhausting to stack S<sub>3</sub>, controlled by a baghouse.

- (e) One (1) sheet molding compound line, identified as SMC Mixer M<sub>4</sub>, relocated with the Cowels Mixer, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S<sub>3</sub>, controlled by a baghouse.
- (f) Nine bulk molding compound mixers, identified as M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B<sub>4</sub>, and all exhausting to stack S<sub>4</sub>.
- (g) Five (5) bulk molding compound (BMC) mixers, identified as M<sub>16</sub> - M<sub>20</sub> for bulk molding compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B<sub>9</sub>, exhausting inside the building.**
- ~~(g)~~(h) One bulk molding compound scale, identified as SC<sub>1</sub>, connected to mixers M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, with a maximum capacity of 11,970 pounds (1330 pounds X 9 lines) per hour, equipped with baghouse B<sub>4</sub> and exhausting to stack S<sub>4</sub>.
- ~~(h)~~ (i) One electric oven, identified as O<sub>1</sub>, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.
- ~~(i)~~ (j) One fiberglass pultrusion molding machine, identified as P<sub>1</sub>, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B<sub>5</sub> and B<sub>6</sub>, and exhausting to stack S<sub>7</sub>.
- ~~(j)~~ (k) Two bulk molding compound (lab) mixers, identified as M<sub>14</sub> and M<sub>15</sub>, for bulk molding compound production, each with a maximum capacity of 66 pounds per hour, with no pollution control equipment and exhausting inside the building, with no outside exhaust.
- ~~(k)~~ (l) One grinder, identified as G<sub>1</sub>, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B<sub>7</sub>, and exhausting to stack S<sub>6</sub>.

(2) *Section A.3 will be modified to include the additional insignificant activities:*

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or
  - (2) having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Stationary fire pumps.
- (j) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (k) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (l) Five aboveground polyester resin storage tanks, identified as T<sub>1</sub> - T<sub>5</sub>, each with a maximum capacity of 6,200 gallons, each equipped with one vent, V<sub>1</sub> - V<sub>5</sub>, and each with the potential to emit less than 5 tons VOC/year.
- (m) One underground styrene storage tank, identified as T<sub>6</sub>, with a maximum capacity of 4,000 gallons, equipped with vent V<sub>6</sub>, with the potential to emit less than 1 ton styrene/year.
- (n) **Two (2) laboratory BMC mixers with a maximum capacity of 100 pounds per hour and 10 pounds per hour respectively, to model the operation of the new mixers M<sub>16</sub> - M<sub>20</sub>.**

#### SECTION D.1

#### FACILITY OPERATION CONDITIONS

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

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.
- (b) One plastic sander, identified as SN<sub>1</sub> for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B<sub>3</sub>, and exhausting to stack S<sub>1</sub>.
- (c) Two mixers, identified as M<sub>1</sub> and M<sub>2</sub>, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>2</sub>.
- (d) One (1) sheet molding compound mixer, identified as SMC Mixers M<sub>3</sub>, for sheet molding compound production with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S<sub>3</sub>, controlled by a baghouse.
- (e) One (1) sheet molding compound line, identified as SMC Mixer M<sub>4</sub>, relocated with the Cowels Mixer, and two (2) other mixers where pigment and thickener are added for sheet molding compound production, with increase in maximum throughput from 313 pounds per hour to 1,200 pounds per hour, exhausting to stack S<sub>3</sub>, controlled by a baghouse.
- (f) Nine bulk molding compound mixers, identified as M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B<sub>4</sub>, and all exhausting to stack S<sub>4</sub>.
- (g) **Five (5) bulk molding compound (BMC) mixers, identified as M<sub>16</sub> - M<sub>20</sub> for bulk molding**

	<b>compound production, each with a maximum capacity of 1,000 pounds per hour with Particulate Matter (PM) emissions controlled by baghouse B<sub>9</sub>, exhausting inside the building.</b>
<del>(g)</del> (h)	One bulk molding compound scale, identified as SC <sub>1</sub> , connected to mixers M <sub>5</sub> - M <sub>13</sub> , for bulk molding compound production, with a maximum capacity of 11,970 pounds (1330 pounds X 9 lines) per hour, equipped with baghouse B <sub>4</sub> and exhausting to stack S <sub>4</sub> .
<del>(h)</del> (i)	One electric oven, identified as O <sub>1</sub> , for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S <sub>5</sub> .
<del>(i)</del> (j)	One fiberglass pultrusion molding machine, identified as P <sub>1</sub> , for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B <sub>5</sub> and B <sub>6</sub> , and exhausting to stack S <sub>7</sub> .
<del>(j)</del> (k)	Two bulk molding compound (lab) mixers, identified as M <sub>14</sub> and M <sub>15</sub> , for bulk molding compound production, each with a maximum capacity of 66 pounds per hour, with no pollution control equipment and exhausting inside the building, with no outside exhaust.
<del>(k)</del> (l)	One grinder, identified as G <sub>1</sub> , for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B <sub>7</sub> , and exhausting to stack S <sub>6</sub> .

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

D.1.1 no change

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52 Subpart P]**

**(a)** Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
Plastic sheet processes (B <sub>1,2,3</sub> )	.3075	1.86
Bulk molding processes (B <sub>4</sub> )	4 lines X 0.665 = 2.66	7.90
Fiberglass pultrusion processes (B <sub>5,6</sub> )	0.0545	0.58
Fiberglass chips processes (B <sub>7</sub> )	0.25	1.62
Mixing Line M <sub>3</sub>	0.60	2.9
Mixing Line M <sub>4</sub>	0.60	2.9
<b>Mixing Line M<sub>16</sub></b>	<b>0.50</b>	<b>2.58</b>
<b>Mixing Line M<sub>17</sub></b>	<b>0.50</b>	<b>2.58</b>
<b>Mixing Line M<sub>18</sub></b>	<b>0.50</b>	<b>2.58</b>
<b>Mixing Line M<sub>19</sub></b>	<b>0.50</b>	<b>2.58</b>
<b>Mixing Line M<sub>20</sub></b>		

	<b>0.50</b>	<b>2.58</b>
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The pounds per hour PM limitations shall be calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.1.3 through D.1.11 no change

#### D.1.12 Particulate Matter (PM)

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- (a) Pursuant to CP 057-4373-00042 issued on May 13, 1996, the vacuum/baghouses B<sub>1,2</sub>, for PM control shall be in operation at all times the sawing processes are in operation. Baghouse B<sub>3</sub> shall be in operation at all times the sander is in operation. Baghouse B<sub>4</sub> shall be in operation at all times the bulk molding compound processes are in operation. Baghouses B<sub>5,6</sub> shall be in operation at all times the fiberglass pultrusion molding machines are in operation. Baghouse B<sub>7</sub> shall be in operation at all times the fiberglass chips processes are in operation.
  - (b) The Baghouse S<sub>3</sub> shall be in operation at all times when any of the sheet molding compound line mixer, identified as SMC Mixers M<sub>3</sub> and M<sub>4</sub> is in operation, in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.2.
  - (c) **The Baghouse B<sub>9</sub> shall be in operation at all times when any of the Bulk Molding Compound Mixing Line, identified as M<sub>16</sub> - M<sub>20</sub> is in operation in order to comply with the PM limits in Condition D.1.2(b).**

D.1.13 and D.1.14 no change

#### Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached **Part 70 Minor Source Modification No. 057-20904-00042 and Minor Permit Modification No.: 057-20971-00042.**

**HAPs**  
**Potential to Emit**  
**Bulk Molding Compound Mixers (M16-M20)**

**Mixer Production Rate (lb/hr) 1,000**

**Number of Mixers 5**

Poly Mold, Medium Styrene (from 1999 application)										Hazardous Air Pollutant				HAP Potential Emissions			
Raw Material	Density lb/gal	Weight % Volatile (H2O) & Organics	Weight % Water	Weight % Organics	Volume % Water	Percent of Total Mixture	Maximum Hourly Throughput lbs	Maximum Annual Throughput lbs	Flash-off %	Weight % Styrene	Weight % Hexane	Weight % Vinyl Acetate	Weight % Dibutyl Phthalate	Styrene tons	Hexane tons	Vinyl Acetate tons	Dibutyl Acetate
Filler	0	0.00%	0.00%	0.00%	0.00%	60.40%	3,022	26,472,720	0.393%	0.00%				0.00			
Styrene	8.34	99.80%	0.00%	99.80%	0.00%	2.20%	108	946,080	0.393%	99.80%				1.86			
Fiberglass	0	0.00%	0.00%	0.00%	0.00%	17.20%	861	7,539,963	0.393%	0.00%				0.00			
Inhibitor	10.17	0.00%	0.00%	0.00%	0.00%	0.10%	4	35,040	0.393%	0.00%				0.00			
Cleaner		99.00%	0.00%	99.00%	0.00%	0.00%	1	8,760	100.000%	0.00%							
HYCAR 1300 X40 (resin)	7.87	50.00%	0.00%	50.00%	0.00%	0.10%	3	26,280	0.393%	50.00%				0.03			
LP-4016 (resin)	8.25	61.00%	0.00%	61.00%	0.00%	0.40%	20	175,200	0.393%	60.00%		0.80%		0.21		0.003	
MR14027 (resin)	9.16	33.00%	0.00%	33.00%	0.00%	6.50%	325	2,847,000	0.393%	30.48%				1.71			
MR14029 (resin)	9.01	40.00%	0.00%	40.00%	0.00%	11.90%	595	5,212,200	0.393%	37.39%				3.83			
MR9600 (resin)	9.163	37.00%	0.00%	37.00%	0.00%	0.30%	14	122,640	0.393%	35.00%				0.08			
N-400 (resin)		67.00%	0.00%	67.00%	0.00%	0.40%	20	175,200	0.393%	67.00%				0.23			
Luperox P (catalyst)	8.68	100.00%	0.00%	100.00%	0.00%	0.50%	23	201,480	0.393%	0.00%				0.00			
Luperox 256 (catalyst)	7.9	0.00%	0.00%	0.00%	0.00%	0.10%	3	26,280	0.393%	0.00%				0.00			
Modifier H	8.7	75.00%	0.00%	75.00%	0.00%	0.10%	3	26,280	0.393%		1.00%				0.001		
<b>TOTALS</b>														<b>7.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

<b>Combined HAP Emissions</b>	<b>7.9</b>
<b>Single HAP (Styrene)</b>	<b>7.9</b>

Note: VOC or HAP Ef was a weighted average of the EF found in the NESHAP.  $(95\% * 0.25\%) + (5\% * 3.1\%) = 0.393\%$   
 The BMC mixing is considered to be covered 95% of the time. (EF is 0.25% of the available HAP or VOC) and is considered to be an open process with active ventilation of the mixing vessel 5% of the time (EF is 3.1% of the available HAP or VOC).

**HAPs**  
**Potential to Emit**  
**Bulk Molding Compound Mixers (M16-M20)**

**Mixer Production Rate (lb/hr) 1,000**

**Number of Mixers 5**

Poly Mold, Medium Styrene (from 1999 application)										Hazardous Air Pollutant				HAP Potential Emissions			
Raw Material	Density lb/gal	Weight % Volatile (H2O) & Organics	Weight % Water	Weight % Organics	Volume % Water	Percent of Total Mixture	Maximum Hourly Throughput lbs	Maximum Annual Throughput lbs	Flash-off %	Weight % Styrene	Weight % Hexane	Weight % Vinyl Acetate	Weight % Dibutyl Phthalate	Styrene tons	Hexane tons	Vinyl Acetate tons	Dibutyl Acetate
Filler	0	0.00%	0.00%	0.00%	0.00%	60.40%	3,022	26,472,720	0.393%	0.00%				0.00			
Styrene	8.34	99.80%	0.00%	99.80%	0.00%	2.20%	108	946,080	0.393%	99.80%				1.86			
Fiberglass	0	0.00%	0.00%	0.00%	0.00%	17.20%	861	7,539,963	0.393%	0.00%				0.00			
Inhibitor	10.17	0.00%	0.00%	0.00%	0.00%	0.10%	4	35,040	0.393%	0.00%				0.00			
Cleaner		99.00%	0.00%	99.00%	0.00%	0.00%	1	8,760	100.000%	0.00%							
HYCAR 1300 X40 (resin)	7.87	50.00%	0.00%	50.00%	0.00%	0.10%	3	26,280	0.393%	50.00%				0.03			
LP-4016 (resin)	8.25	61.00%	0.00%	61.00%	0.00%	0.40%	20	175,200	0.393%	60.00%		0.80%		0.21		0.003	
MR14027 (resin)	9.16	33.00%	0.00%	33.00%	0.00%	6.50%	325	2,847,000	0.393%	30.48%				1.71			
MR14029 (resin)	9.01	40.00%	0.00%	40.00%	0.00%	11.90%	595	5,212,200	0.393%	37.39%				3.83			
MR9600 (resin)	9.163	37.00%	0.00%	37.00%	0.00%	0.30%	14	122,640	0.393%	35.00%				0.08			
N-400 (resin)		67.00%	0.00%	67.00%	0.00%	0.40%	20	175,200	0.393%	67.00%				0.23			
Luperox P (catalyst)	8.68	100.00%	0.00%	100.00%	0.00%	0.50%	23	201,480	0.393%	0.00%				0.00			
Luperox 256 (catalyst)	7.9	0.00%	0.00%	0.00%	0.00%	0.10%	3	26,280	0.393%	0.00%				0.00			
Modifier H	8.7	75.00%	0.00%	75.00%	0.00%	0.10%	3	26,280	0.393%		1.00%				0.001		
<b>TOTALS</b>														<b>7.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

<b>Combined HAP Emissions</b>	<b>7.9</b>
<b>Single HAP (Styrene)</b>	<b>7.9</b>

Note: VOC or HAP Ef was a weighted average of the EF found in the NESHAP.  $(95\% * 0.25\%) + (5\% * 3.1\%) = 0.393\%$   
 The BMC mixing is considered to be covered 95% of the time. (EF is 0.25% of the available HAP or VOC) and is considered to be an open process with active ventilation of the mixing vessel 5% of the time (EF is 3.1% of the available HAP or VOC).