



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: August 4, 2005
RE: Premier Fiberglass / 039-20908-00336
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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August 4, 2005

Mr. John Kellogg
Premier Fiberglass
55080 Phillips Street
Elkhart, IN 46514

Re: 039-20908
First Significant Permit Modification to
Part 70 Permit No.: 039-17616-00336

Dear Mr. Kellogg:

Premier Fiberglass was issued a Part 70 permit on April 8, 2004, for a fiberglass parts production plant. An application requesting changes to this permit was received by the Office of Air Quality (OAQ) on March 10, 2005. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the revision of the compliance demonstration emission calculation methodology from averaging within each resin or gelcoat category to cross-averaging across tooling and production gelcoats. The Permittee shall comply with the provisions of 326 IAC 20-25-3 (g)(2) at all times when using monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3 (a).

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gaurav Shil, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or at 973-575-2555, extension 3259, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
GS / EVP

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector – Tony Pelath
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Premier Fiberglass
55080 Phillips Street
Elkhart, Indiana 46514**

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

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

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

Operation Permit No.: T039-17616-00336	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 8, 2004
1 st Administrative Amendment 039-19050-00336	Issuance Date: June 29, 2004
First Significant Permit Modification No.:039-20908-00336	Pages Affected: 2, 3, 5, 15, 25 to 28
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 4, 2005

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates stationary fiberglass parts manufacturing plant that produces miscellaneous fiberglass parts and component parts for RV industry.

Responsible Official: John Kellogg
Source Address: 55080 Phillips Street, Elkhart, Indiana, 46514
Mailing Address: 55080 Phillips Street, Elkhart, Indiana, 46514
General Source Phone Number: (574) 264-5457
SIC Code: 3089
County Location: Elkhart
Source Location Status: Nonattainment for ozone under the 8-hour standard;
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD and Emission Offset Rules; and
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 fiberglass manufacturing company that produces miscellaneous fiberglass parts and component parts for RV industry consists of the following emission units and pollution control devices as follows:

Plant 1 located at located at 55080 Philips Street, Elkhart, Indiana 46514:

- (a) one (1) gel coat spray booth, identified as Booth 1, utilizing a non-atomized or air-assisted airless spray application system, coating a maximum of 10 production units per hour, with dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as S1 and S2.
- (b) one (1) resin spray booth, identified as Booth 2, utilizing a nonatomized or air-assisted airless spray application system, coating a maximum of 10 production units per hour, with dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as S3 and S4; and

Plant 2 located at located at 55080 Philips Street, Elkhart, Indiana 46514:

- (c) one (1) plastic grinding area, identified as V9, processing a maximum of 218 pounds per hour, with a filter for particulate matter control, and exhausting to one (1) stack, identified as S5.

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

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

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).

- (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.24 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.

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

Pursuant to CP-039-4651-00336, issued on October 24, 1996, and 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the gel coat and resin spray booths (Booth 1 and Booth 2) shall be as follows:

- (a) the use of airless, nonatomized and/or air-assisted airless spray applicators at all times that the spray booths are in operation.
- (b) The total emissions of volatile organic compounds (VOC) from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited to 7.06 tons per month which is equivalent to 84.72 tons per year.

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

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

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

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

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.16 is sufficient for demonstrating compliance with the HAP monomer content limits.

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

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spraying [if approved by IDEM], or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

$$\sum Em_A < \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
 M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.

E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: *mass = tons*
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

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

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

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

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

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

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

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

- (1) Nonatomized application technology.

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

D.1.6 Particulate Matter (PM)][40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, PM from the gel coat and resin spray booths (Booth 1 and Booth 2) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to CP 039-4651-00336, issued on October 24, 1996 and 326 IAC 6-3-2(d), particulate from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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 this facility and any control devices.

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition 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. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Hazardous Air Pollutants (HAP)

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

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

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

D.1.11 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR 64.7]

D.1.12 Monitoring [40 CFR Part 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat and resin surface coating booth stacks (S1, S2, S3, and S4) 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack 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 deviation from this permit.

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

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

Source Background and Description

Source Name:	Premier Fiberglass
Source Location:	55080 Phillips Street, Elkhart IN 46514
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T039-17616-00336
Operation Permit Issuance Date:	April 8, 2004
Significant Permit Modification No.:	039-20908-00336
Permit Reviewer:	Gaurav Shil/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit modification application from Premier Fiberglass relating to the revision of the compliance demonstration emission calculation methodology from averaging within each material category to cross-averaging across material categories.

Explanation of Modification Requested

On March 10, 2005, Premier Fiberglass Company, Inc. submitted a request to revise Condition D.1.5 (a) in Part 70 operating permit no. 039-17616-00336, issued on April 8, 2004. The Permittee requested to revise the compliance demonstration emission calculation methodology from averaging within each resin or gelcoat category to cross-averaging across tooling and production gelcoats. The Permittee shall comply with the provisions of 326 IAC 20-25-3 (g)(2) at all times when using monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3 (a).

Existing Approvals

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

- (a) T039-17616-00336 issued on April 8, 2004; and
- (b) First administrative amendment no. 039-19050-00336 issued on June 29, 2004.

Enforcement Issue

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

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 10, 2005.

Potential To Emit Before Controls (Modification)

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

There is no change in uncontrolled potential to emit due to this modification.

Justification for Modification

The Title V permit is being modified through a Significant Permit Modification. This modification request does not qualify as minor permit modification or as an administrative amendment under 326 IAC 2-7-11 or 325 IAC 2-7-12 (a), respectively. Therefore, pursuant to 326 IAC 2-7-12 (d)(1) the modification shall be processed in accordance with the procedures in 326 IAC 2-7-12 (d).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	Attainment or Unclassifiable
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Nonattainment
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 the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emissions Offset, 326 IAC 2-3.
- (b) Elkhart 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.

- (c) Elkhart County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Less than 250
VOC	Less than 100 ⁽¹⁾
CO	Less than 250
NOx	Less than 100

Note: (1) Pursuant to Condition D.1.4 in Part 70 permit T039-17616-00336 issued on April 8, 2004, the VOC emissions from the gel coat and resin spray booths (Booth 1 and Booth 2) are limited to 84.72 tons per year and source wide potential to emit VOC shall be less than 100 tons per year.

- (a) This existing source is a minor stationary source for PSD review because no attainment regulated pollutant is emitted at a rate greater than 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) This existing source is a minor stationary source under Emission Offset, 326 IAC 2-3 because Elkhart County was designated as non-attainment for the 8-hour ozone standard on June 15, 2004 and both VOC and NOx are emitted at a rate less than 100 tons per year.
- (c) These emissions are based upon the Part 70 permit T039-17616-00336 issued on April 8, 2004.

Potential to Emit After Controls for the Modification

- (a) There is no change to the total potential to emit, reflecting all limits, as a result of this modification.
- (b) This modification to an existing minor stationary source is not major because there is no emission increase from the modification. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) This modification to an existing minor stationary source is not major because there is no emission increase from the modification. Therefore, the Emissions Offset, 326 IAC 2-3 requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit as a result of this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit as a result of this modification.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

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

326 IAC 2-3 (Emissions Offset)

Elkhart County has been designated as non-attainment for the 8-hour ozone standard on June 15, 2004. VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Pursuant to Condition D.1.4 in Part 70 renewal no. 039-17616-00338, issued on April 8, 2004, the total VOC emissions from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited to 84.72 tons per year. The source wide potential to emit of both VOC and NO_x are less than 100 tons per year. The source is classified as minor for the purpose of Emissions Offset. There is no VOC or NO_x emission increase from this modification. Therefore, the Emission Offset, 326 IAC 2-3 requirements will continue to not apply.

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

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

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

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

Pursuant to this modification request, the compliance demonstration emission calculation methodology using cross-averaging across tooling and production gelcoats is included in the permit. The Permittee shall comply with the provisions of 326 IAC 20-25-3 (g)(2) at all times when using monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3 (a).

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

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

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

^a American National Standards Institute.

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

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.16 is sufficient for demonstrating compliance with the HAP monomer content limits.

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

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

For Averaging across categories:

$$\sum E_{mA} < \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

- M_R = Total monthly mass of resins within each resin category
 M_G = Total monthly mass of gel coats within each gel coats category
- E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
 E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
 E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls
- Units:** *mass = tons*
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

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

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

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

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

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

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

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

- (1) Nonatomized application technology.
- (2) Air-assisted airless.

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

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

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.

- (3) Waste resins and gel coats that contain HAPs.
- (4) Cleaning materials, including waste cleaning materials.
- (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

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

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in paragraph (f) below are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from paragraph (a) above if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

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

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.

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

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

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

- (a) Purchase orders.
- (b) Invoices.
- (c) Material safety data sheets (MSDS).
- (d) Manufacturer's certified product data sheets.
- (e) Calculations.
- (f) Other records to confirm compliance.

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

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

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

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

- (a) Name and address of the owner or operator.
- (b) Address of the physical location.

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

The source submitted the initial notification report to IDEM, OAQ on November 28, 2001 and initial statement of compliance on May 28, 2002.

Compliance Requirements

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

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

There have been no changes made to the compliance monitoring requirements for this source.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T039-17616-00336). In addition to the changes specified below revisions are made to the Table of Contents and condition numbers pursuant to addition of new conditions without replication herein.

1. Condition D.1.5, HAP Emission Standards is revised to reflect the revision of the compliance demonstration emission calculation methodology from averaging within each material category to cross-averaging across material categories:

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

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

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

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

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition ~~D.1.17~~ **D.1.16** is sufficient for demonstrating compliance with the HAP monomer content limits.

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

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, controlled spraying [*if approved by IDEM*], or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging ~~within a category:~~

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

Where:-

M_R = Total monthly mass of material within each category

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

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

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

For Averaging across categories:

$$\sum Em_A < \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

- M_R** = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category
- E_{Ra}** = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category
E_{mA} = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls
- Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

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

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

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

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

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

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

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

- (1) Nonatomized application technology.

- (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (e) To determine emission, the following references or methods shall be used:
- (1) "Unified Emission Factors for Open Molding of Composites", July ~~2000~~ **2001**, except use of controlled spray emission factors must be approved by the commissioner.
 - (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and supplements, January 1995, except for hand and spray layup operations emission factors **must be calculated using emission factors referenced in paragraph (1) above or site specific values in paragraph (3) below.**
 - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to OAQ and the U.S. EPA.
2. Elkhart County has been designated as non-attainment for the 8-hour ozone standard on June 15, 2004. Section A.1, General Information is revised as follows to include the updated source status and source location status:

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 stationary fiberglass parts manufacturing plant that produces miscellaneous fiberglass parts and component parts for RV industry.

Responsible Official:	John Kellogg
Source Address:	55080 Phillips Street, Elkhart, Indiana, 46514
Mailing Address:	55080 Phillips Street, Elkhart, Indiana, 46514
General Source Phone Number:	(574) 264-5457
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard; Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program
Minor Source, under PSD **and Emission Offset Rules;**
and
Major Source, Section 112 of the Clean Air Act

3. Conditions D.1.9, D.1.10 and D.1.11 are revised as follows to include the correct condition references:

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition ~~D.1.5~~ **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. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Hazardous Air Pollutants (HAP)

Compliance with the HAP monomer content limitations in Condition ~~D.1.6~~ **D.1.5** shall be determined by one of the following:

D.1.11 VOC Emissions

Compliance with Condition ~~D.1.5~~ **D.1.4** shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

4. I/M & Billing Section was renamed to Billing, Licensing, and Training Section after the Part 70 permit was issued. Condition B.23 (c) is revised as follows to incorporate this change:

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

.....
(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M & Billing~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

5. 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 your permit as follows:

B.24 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.

Conclusion

The operation of the fiberglass parts production plant manufacturing miscellaneous fiberglass parts and component parts for RV industry shall be subject to the conditions of the attached proposed Significant Permit Modification No.: 039-20908-00336.