



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: July 21, 2006  
RE: MAAX Bremen / 099-20996-00020  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**MAAX Bremen  
1010 West Dewey Street  
Bremen, Indiana 46506**

(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.: T099-20996-00020	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 20, 2006  Expiration Date: July 20, 2011

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b> .....	<b>5</b>
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1 (22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B</b>	<b>GENERAL CONDITIONS</b> .....	<b>7</b>
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3- 6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-3]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	<b>17</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	

C.9 Compliance Requirements [326 IAC 2-1.1-11]

## TABLE OF CONTENTS (Continued)

	<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]</b>	
	C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
	C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
	<b>Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]</b>	
	C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
	C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]	
	C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]	
	C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
	C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]	
	C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]	
	C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]	
	<b>Stratospheric Ozone Protection</b>	
	C.19 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>D.1</b>	<b>FACILITY OPERATION CONDITIONS</b> .....	<b>23</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
	D.1.1 National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR 63, Subpart WWWW]	
	D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]	
	D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2]	
	D.1.4 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8] [326 IAC 20-56]	
	D.1.5 Particulate [326 IAC 6-3-2(d)]	
	D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	<b>Compliance Determination Requirements</b>	
	D.1.7 Volatile Organic Compounds (VOC)	
	D.1.8 Particulate Control	
	<b>Compliance Monitoring Requirements</b>	
	D.1.9 Monitoring	
	D.1.10 Visible Emissions Notations	
	<b>Record Keeping and Reporting Requirements</b>	
	D.1.11 Record Keeping Requirements	
	D.1.12 Reporting Requirements	
<b>E.1</b>	<b>FACILITY OPERATION CONDITIONS</b> .....	<b>29</b>
	<b>National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]</b>	
	E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]	
	E.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: Requirements [40 CFR Part 63, Subpart WWWW]	
	E.1.3 One Time Deadlines Relating to NESHAP: Reinforced Plastic Composites Production	

Certification .....	54
Emergency Occurrence Report.....	55
Part 70 Quarterly Reports .....	57
Quarterly Deviation and Compliance Monitoring Report .....	58-59

## 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 and A.3 through A.5 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)]

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The Permittee owns and operates a stationary fiberglass component manufacturing plant.

Responsible Official:	Julie Crum
Source Address:	1010 West Dewey Street, Bremen, Indiana 46506
Mailing Address:	1010 West Dewey Street, Bremen, Indiana 46506
General Source Phone Number:	(574) 546-3298
SIC Code:	3088
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules Major Source, Section 112 of the Clean Air Act

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This fiberglass component manufacturing company consists of two (2) plants:

- (a) Plant 1 (Fiberglass operation ) is located at 1010 West Dewey Street, Bremen, Indiana 46506; and
- (b) Plant 2 (Fiberglass operation) is located at 1010 West Dewey Street, Bremen, Indiana 46506.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

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

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The source consists of the following permitted emission units and pollution control devices:

- (a) Plant 1: One (1) fiberglass operation consisting of:
  - (1) Two (2) FRP chop guns operated by robotics and two (2) FRP chop guns operated by employee for backup/reinforced usage identified as fiberglass chop area, exhausting through vents identified as E-6 through dry filters.
  - (2) The Plant 1 fiberglass trim area has five dust collection systems (CD-1, CD-2, CD-3, CD-4 and CD-5) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gel spray booths, one (1) gelcoat gun operated by robotics and one (1) gelcoat gun operated by employee to produce all non-white colors using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through dry filters and venting through E-2.
  - (4) Mold Prep and Repair
  - (5) Maintenance Area

- (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment and used in the fiberglass operation.
  - (8) Mixing operations
- (b) Plant 2: One (1) fiberglass operation consisting of:
- (1) Three (3) FRP chop guns operated by employee, identified as fiberglass chop shop area, one station exhausting through dry filters and venting through vents identified as E-2, E-3, E-4, E-5 and E-16.
  - (2) One (1) fiberglass trim area has four dust collection systems (CD-1, CD-2, CD-3 and CD-4) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two gelcoat guns operated by employee using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through three exhaust fans (E10, E11 and E12) vice four. These three fans exhaust air through two filtered dog houses.
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment used in the fiberglass operation.
  - (8) Mixing operations

Under NESHAP WWWW, Plants 1 and 2 are considered an existing affected source.

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

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

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (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) Additional information was received on February 15, 1996, March 11, 1996 and July 2, 1996 makes the Part 70 permit application administratively complete.

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

- (a) This permit, T099-20996-00020, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.4 Enforceability [326 IAC 2-7-7]**

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that,

based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), within ninety (90) days of issuance after this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM Main Office

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 1-800-753-5519 or (574) 245-4870

Facsimile Number: (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time

the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T099-20996-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic

incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-3]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 or 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) 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.
- (b) 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.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

- 
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 22, 2000. An updated ERP was submitted to IDEM on February 5, 2001.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

- 
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
  - (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
    - (1) initial inspection and evaluation;
    - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
    - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
  - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
    - (1) monitoring results;
    - (2) review of operation and maintenance procedures and records;
    - (3) inspection of the control device, associated capture system, and the process.
  - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
  - (e) The Permittee shall maintain the following records:
    - (1) monitoring data;
    - (2) monitor performance data, if applicable; and
    - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** The source consists of the following emission units and pollution control devices:

- (a) Plant 1: One (1) fiberglass operation consisting of:
  - (1) Two (2) FRP chop guns operated by robotics and two (2) FRP chop guns operated by employee for backup/reinforced usage identified as fiberglass chop area, exhausting through vents identified as E-6 through dry filters.
  - (2) The Plant 1 fiberglass trim area has five dust collection systems (CD-1, CD-2, CD-3, CD-4 and CD-5) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gel spray booths, one (1) gelcoat gun operated by robotics and one (1) gelcoat gun operated by employee to produce all non-white colors using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through dry filters and venting through E-2
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment and used in the fiberglass operation.
  - (8) Mixing operations
  
- (b) Plant 2: One (1) fiberglass operation consisting of:
  - (1) Three (3) FRP chop guns operated by employee, identified as fiberglass chop shop area, one station exhausting through dry filters and venting through vents identified as E-2, E-3, E-4, E-5 and E-16.
  - (2) One (1) fiberglass trim area has four dust collection systems (CD-1, CD-2, CD-3 and CD-4) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gelcoat guns operated by employee using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through three exhaust fans (E10, E11 and E12) vice four. These three fans exhaust air through two filtered dog houses.
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment used in the fiberglass operation.
  - (8) Mixing operations

Under NESHAP WWWW, Plants 1 and 2 are considered an existing affected source.

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

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

### D.1.1 National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR 63, Subpart WWWW]

Pursuant to 40 CFR 63, Subpart WWWW, the emission units described in this section shall comply with the requirements of Section E.1 of this permit.

### D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the reinforced fiberglass manufacturing facilities are subject to the requirements of 362 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control volatile organic compound (VOC) emissions.

BACT conditions for the reinforced fiberglass manufacturing facilities shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 250 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “Unified Emission Factors for Open Molding of Composites”, July 23, 2001, or its updates, and shall not exceed 32.3% emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight of gel coats or their equivalent on an emission mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, robotics or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$[(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) * (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})] - [(\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission factor for resin or gel coat used, } \%)].$$

- (c) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology, equivalent emissions

reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.
- (e) The listed work practices shall be followed:
  - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed accordance with applicable solid or hazardous waste requirements.
  - (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

#### D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2]

The total source usage of VOCs shall be limited such that VOC emissions are less than 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) will not apply.

#### D.1.4 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-56-2]

- (a) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications shall be trained according to the following schedule:
  - (1) All new personnel hired shall be trained within fifteen (15) days of hiring.
  - (2) To ensure training goals listed in paragraph (b) of this condition are maintained, all personnel shall be given refresher training annually.
  - (3) Personnel who have been trained by another Permittee subject to 326 IAC 20-25 or 326 IAC 20-56 are exempt from the requirement of paragraph (a)(1) of this condition if written documentation that the employee's training is current is provided to the new employer.
  - (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (b) 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.
- (c) The Permittee 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.

**D.1.5 Particulate [326 IAC 6-3-2(d)]**

Particulate emissions from the two (2) FRP chop guns from Plant 1, the three (3) FRP chop guns from Plant 2, the two (2) gelcoat guns used in the fiberglass gel area in Plant 1, the two (2) gelcoat guns used in the gel area of Plant 2, and the fiberglass trim area of Plants 1 and 2 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.7 Volatile Organic Compounds (VOC)**

Compliance with the VOC emission limitations contained in Conditions D.1.2 and D.1.3 shall be determined from the manufacturer's Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst and solvent used in the fiberglass composite manufacturing operations. The VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.

**D.1.8 Particulate Control**

In order to comply with the requirements of Condition D.1.5, the dry filters shall control particulate emissions from the surface coating operations and the trim area at all times that the surface coating operations and the trim area are in operation.

**Compliance Monitoring Requirements**

**D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedences, 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. When there is a noticeable change in overspray emissions or when evidence of overspray is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedences, shall be considered a deviation of this permit.

#### D.1.10 Visible Emissions Notations

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- (a) Visible emission notations of the fiberglass facilities' stack exhaust shall be performed once per week when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance to Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

### Record Keeping and Reporting Requirements

#### D.1.11 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.3 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.3 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and VOC content of each gel coat, resin, catalyst and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following training records:
  - (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.
- (c) To document compliance with Condition D.1.13, the Permittee shall maintain a log of monthly overspray observations and daily inspections of the filters.
- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhausts.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.2(a) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION E.1

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** The source consists of the following emission units and pollution control devices:

- (a) Plant 1: One (1) fiberglass operation consisting of:
  - (1) Two (2) FRP chop guns operated by robotics and two (2) FRP chop guns operated by employee for backup/reinforced usage identified as fiberglass chop area, exhausting through vents identified as E-6 through dry filters.
  - (2) The Plant 1 fiberglass trim area has five dust collection systems (CD-1, CD-2, CD-3, CD-4 and CD-5) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gel spray booths, one (1) gelcoat gun operated by robotics and one (1) gelcoat gun operated by employee to produce all non-white colors using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through dry filters and venting through E-2
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment and used in the fiberglass operation.
  - (8) Mixing operations
  
- (b) Plant 2: One (1) fiberglass operation consisting of:
  - (1) Three (3) FRP chop guns operated by employee, identified as fiberglass chop shop area, one station exhausting through dry filters and venting through vents identified as E-2, E-3, E-4, E-5 and E-16.
  - (2) One (1) fiberglass trim area has four dust collection systems (CD-1, CD-2, CD-3 and CD-4) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gelcoat guns operated by employee using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through three exhaust fans (E10, E11 and E12) vice four. These three fans exhaust air through two filtered dog houses.
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment used in the fiberglass operation.
  - (8) Mixing operations

Mold area has been shut down and the remaining gel coat gun is being used as a backup for odd colors. However repair work is performed there and vented through E-1 and E-2.

The manufacturing company is permitted to operate, source wide: seven (7) polyester resin/chopped fiberglass units and five gel coat spray booths.

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

## **National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

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

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the fiberglass manufacturing operations and all associated activities, such as mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with the schedule in 40 CFR 63, Subpart WWWW.

### **E.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: Requirements [40 CFR Part 63, Subpart WWWW]**

Pursuant to 40 CFR Part 63, Subpart WWWW, the fiberglass manufacturing operations and all associated activities, such as mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites shall comply with the following provisions on and after April 21, 2006:

## **What This Subpart Covers**

### **§ 63.5785 Am I subject to this subpart?**

(a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or no reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

### **§ 63.5790 What parts of my plant does this subpart cover?**

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

**§ 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?**

(b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

**Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting**

**§ 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?**

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

**§ 63.5797 How do I determine the organic HAP content of my resins and gel coats?**

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

(a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

(b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

**§ 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?**

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in §63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in §63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the

Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

(b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.

(1) *Use a calculated emission factor.* Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in §63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

## **Compliance Dates and Standards**

### **§ 63.5800 When do I have to comply with this subpart?**

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

### **§ 63.5805 What standards must I meet to comply with this subpart?**

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold.

(b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.

(g) If you have repair operations subject to this subpart as defined in §63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of this section.

(h) If you use an add-on control device to comply with this subpart, you must meet all requirements contained in 40 CFR part 63, subpart SS.

## **Options for Meeting Standards**

### **§ 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?**

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the

end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream  $EF_i$ =actual organic HAP emissions factor for process stream  $i$ , lbs/ton;

$\text{Material}_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream  $i$ , tons;

$n$ =number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

### **General Compliance Requirements**

#### **§ 63.5835 What are my general requirements for complying with this subpart?**

(a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

(b) You must be in compliance with all organic HAP emissions limits in this subpart that you meet using add-on controls, except during periods of startup, shutdown, and malfunction.

(c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(d) You must develop and implement a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emissions limits you meet using an add-on control.

### **Testing and Initial Compliance Requirements**

#### **§ 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?**

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

#### **§ 63.5860 How do I demonstrate initial compliance with the standards?**

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of §63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

Emission Factor, Percent Reduction, and Capture Efficiency Calculation Procedures for Continuous Lamination/Casting Operations

### **Continuous Compliance Requirements**

#### **§ 63.5895 How do I monitor and collect data to demonstrate continuous compliance?**

(b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.

(4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

#### **§ 63.5900 How do I demonstrate continuous compliance with the standards?**

(a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.

(2) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.

(c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

#### **Notifications, Reports, and Records**

##### **§ 63.5905 What notifications must I submit and when?**

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

### **§ 63.5910 What reports must I submit and when?**

(a) You must submit each report in Table 14 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(d) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).

(g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.

(i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

#### **§ 63.5915 What records must I keep?**

(a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart.

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

(1) You must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;

(2) You must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

(3) When using facility-specific organic HAP emissions estimation equations or factors, you must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and

(4) For all organic HAP emissions estimation equations and organic HAP emissions factors, you must keep documentation that the appropriate permitting authority has approved them.

#### **§ 63.5920 In what form and how long must I keep my records?**

(a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

### **Other Requirements and Information**

#### **§ 63.5925 What parts of the General Provisions apply to me?**

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

#### **§ 63.5930 Who implements and enforces this subpart?**

(a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the organic HAP emissions standards in §63.5805 under §63.6(g).

(2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

#### **§ 63.5935 What definitions apply to this subpart?**

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

*Atomized mechanical application* means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

*Bulk molding compound (BMC)* means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composite products.

*BMC manufacturing* means a process that involves the preparation of BMC.

*Centrifugal casting* means a process for fabricating cylindrical composites, such as pipes, in which composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces until the part is sufficiently cured to maintain its physical shape.

*Charge* means the amount of SMC or BMC that is placed into a compression or injection mold necessary to complete one mold cycle.

*Cleaning* means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

*Clear production gel coat* means an unpigmented, quick-setting resin used to improve the surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

*Closed molding* means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (e.g., compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

*Composite* means a shaped and cured part produced by using composite materials.

*Composite materials* means the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.

*Compression molding* means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

*Compression/injection molding* means a grouping of processes that involves the use of compression molding and/or injection molding.

*Continuous casting* means a continuous process for fabricating composites in which composite materials are placed on an in-line conveyor belt to produce cast sheets that are cured in an oven.

*Continuous lamination* means a continuous process for fabricating composites in which composite materials are typically sandwiched between plastic films, pulled through compaction rollers, and cured in an oven. This process is generally used to produce flat or corrugated products on an in-line conveyor.

*Continuous lamination/casting* means a grouping of processes that involves the use of continuous lamination and/or continuous casting.

*Controlled emissions* means those organic HAP emissions that are vented from a control device to the atmosphere.

*Corrosion-resistant gel coat* means a gel coat used on a product made with a corrosion-resistant resin that has a corrosion-resistant end-use application.

*Corrosion-resistant end-use applications* means applications where the product is manufactured specifically for an application that requires a level of chemical inertness or resistance to chemical attack above that required for typical reinforced plastic composites products. These applications include, but are not limited to, chemical processing and storage; pulp and paper production; sewer and wastewater treatment; power generation; potable water transfer and storage; food and drug processing; pollution or odor control; metals production and plating; semiconductor manufacturing; petroleum production, refining, and storage; mining; textile production; nuclear materials storage; swimming pools; and cosmetic production, as well as end-use applications that require high strength resins.

*Corrosion-resistant industry standard* includes the following standards: ASME RTP-1 or Sect. X; ASTM D5364, D3299, D4097, D2996, D2997, D3262, D3517, D3754, D3840, D4024, D4160, D4161, D4162, D4184, D3982, or D3839; ANSI/AWWA C950; UL 215, 1316 or 1746, IAPMO PS-199, or written customer requirements for resistance to specified chemical environments.

*Corrosion-resistant product* means a product made with a corrosion-resistant resin and is manufactured to a corrosion-resistant industry standard, or a food contact industry standard, or is manufactured for corrosion-resistant end-use applications involving continuous or temporary chemical exposures.

*Corrosion-resistant resin* means a resin that either:

(1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH  $\geq$  12.0 or  $\leq$  3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points

when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or

(2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

*Doctor box* means the box or trough on an SMC machine into which the liquid resin paste is delivered before it is metered onto the carrier film.

*Filament application* means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

*Filled Resin* means that fillers have been added to a resin such that the amount of inert substances is at least 10 percent by weight of the total resin plus filler mixture. Filler putty made from a resin is considered a filled resin.

*Fillers* means inert substances dispersed throughout a resin, such as calcium carbonate, alumina trihydrate, hydrous aluminum silicate, mica, feldspar, wollastonite, silica, and talc. Materials that are not considered to be fillers are glass fibers or any type of reinforcement and microspheres.

*Fire retardant gel coat* means a gel coat used for products for which low-flame spread/low-smoke resin is used.

*Fluid impingement technology* means a spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams.

*Food contact industry standard* means a standard related to food contact application contained in Food and Drug Administration's regulations at 21 CFR 177.2420.

*Gel Coat* means a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

*Gel coat application* means a process where either clear production, pigmented production, white/off-white or tooling gel coat is applied.

*HAP-containing materials storage* means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

*High Performance gel coat* means a gel coat used on products for which National Sanitation Foundation, United States Department of Agriculture, ASTM, durability, or other property testing is required.

*High strength gel coat* means a gel coat applied to a product that requires high strength resin.

*High strength resins* means polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles.

*Injection molding* means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

*Low Flame Spread/Low Smoke Products* means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or

exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density  $D_s$  @ 1.5 minutes less than or equal to 100 and  $D_s$  @ 4 minutes less than or equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

*Manual resin application* means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

*Mechanical resin application* means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

*Mixing* means the blending or agitation of any HAP-containing materials in vessels that are 5.00 gallons (18.9 liters) or larger, and includes the mixing of putties or polyputties. Mixing may involve the blending of resin, gel coat, filler, reinforcement, pigments, catalysts, monomers, and any other additives.

*Mold* means a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

*Neat gel coat* means the resin as purchased for the supplier, but not including any inert fillers.

*Neat gel coat plus* means neat gel coat plus any organic HAP-containing materials that are added to the gel coat by the supplier or the facility, excluding catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

*Neat resin* means the resin as purchased from the supplier, but not including any inert fillers.

*Neat resin plus* means neat resin plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

*Nonatomized mechanical application* means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

*Noncorrosion-resistant resin* means any resin other than a corrosion-resistant resin or a tooling resin.

*Noncorrosion-resistant product* means any product other than a corrosion-resistant product or a mold.

*Non-routine manufacture* means that you manufacture parts to replace worn or damaged parts of a reinforced plastic composites product, or a product containing reinforced plastic composite parts, that was originally manufactured in another facility. For a part to qualify as non-routine manufacture, it must be used for repair or replacement, and the manufacturing schedule must be based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

*Operation* means a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.

*Operation group* means a grouping of individual operations based primarily on mold type. Examples are open molding, closed molding, and centrifugal casting.

*Open molding* means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

*Pigmented gel coat* means a gel coat that has a color, but does not contain 10 percent or more titanium dioxide by weight. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

*Polymer casting* means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open, except for smoothing the material and/or vibrating the mold to remove bubbles. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.

*Preform Injection* means a form of pultrusion where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, is collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels, reservoirs, transfer systems, and collection systems are covered or shielded from the ambient air. Preform injection differs from direct die injection in that the injection chambers are not directly attached to the die.

*Prepreg materials* means reinforcing fabric received precoated with resin which is usually cured through the addition of heat.

*Pultrusion* means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

*Repair* means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

*Resin transfer molding* means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.

*Sheet molding compound (SMC)* means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners, mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

*Shrinkage controlled resin* means a resin that when promoted, catalyzed, and filled according to the resin manufacturer's recommendations demonstrates less than 0.3 percent linear shrinkage when tested according to ASTM D2566.

*SMC manufacturing* means a process which involves the preparation of SMC.

*Tooling gel coat* means a gel coat that is used to form the surface layer of molds. Tooling gel coats generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

*Tooling resin* means a resin that is used to produce molds. Tooling resins generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

*Uncontrolled oven organic HAP emissions* means those organic HAP emissions emitted from the oven through closed vent systems to the atmosphere and not to a control device. These organic HAP emissions do not include organic HAP emissions that may escape into the workplace through the opening of panels or doors on the ovens or other similar fugitive organic HAP emissions in the workplace.

*Uncontrolled wet-out area organic HAP emissions* means any or all of the following: Organic HAP emissions from wet-out areas that do not have any capture and control, organic HAP emissions that escape from wet-out area enclosures, and organic HAP emissions from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to an add-on control device.

*Unfilled* means that there has been no addition of fillers to a resin or that less than 10 percent of fillers by weight of the total resin plus filler mixture has been added.

*Vapor suppressant* means an additive, typically a wax, that migrates to the surface of the resin during curing and forms a barrier to seal in the styrene and reduce styrene emissions.

*Vapor-suppressed resin* means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

*White and off-white gel coat* means a gel coat that contains 10 percent of more titanium dioxide by weight.

**Table 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams**

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams  
 As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:  
 If your operation And you use... With...  
 type is a new or existing...  
 Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent organic HAP for nonatomized gel coat) 216...

i. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	$EF = (0.286 \times \%HAP \times 2000)$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$
		ii. vapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$
		iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.126 \times \%HAP \times 2000 \times 0.8$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.8$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.126 \times \%HAP \times 2000 \times 0.5$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.5$
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000$
		ii. vapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
		iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.85$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.55$
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000$
		ii. vapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
		iii. closed-mold curing with roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.85$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.55$
	d. atomized mechanical resin application with robotic or augmented spray control	nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times 0.77$	$EF = 0.77 \times ((0.714 \times \%HAP) - 0.18) \times 2000$
	e. filament application	i. nonvapor-suppressed resin	$EF = 0.184 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000$
		ii. vapor-suppressed resin	$EF = 0.12 \times \%HAP \times 2000 \times 0.65$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000 \times 0.65$
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$

9. nonatomized spray gel coat application	EF = 0.185 x (HAP) x 2000	EF = (0.4506 x (HAP) - 0.0505) x 2000
10. atomized spray gel coat application using robotic or automated spray	EF = 0.445 x (HAP) x 2000 x 0.73	EF = (1.03646 x (HAP) - 0.195) x 2000 x 0.73
2. centrifugal casting operations 78		
a. heated air blown through molds	EF = 0.558 x (HAP) x 2000	EF = 0.558 x (HAP) x 2000
b. vented molds, but air vented through the molds is not heated	EF = 0.026 x (HAP) x 2000	EF = 0.026 x (HAP) x 2000

Footnotes to Table 1

- The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart MMW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.
- To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5910. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.
- Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.
- The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.
- This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.
- Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.
- These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.
- If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

**Table 2 to Subpart WWWW of Part 63—Compliance Dates for New and Existing Reinforced Plastic Composites Facilities**

As required in §§63.5800 and 63.5840 you must demonstrate compliance with the standards by the dates in the following table:

If your facility is . . .	And . . .	Then you must comply by this date . . .
1. An existing source.....	a. Is a major source on or before the publication date of this subpart.	i. April 21, 2006, or ii. You must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.

**Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP**

As specified in §63.5805, you must meet the following organic HAP emissions limits that apply to you:

Table 3 to Subpart WWWW of Part 63.\_Organic HAP Emissions Limits for Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous Lamination/Casting Operations

If your operation type is . . .	And you use . . .	\1\ Your organic HAP emissions limit is . . .
1. open molding_corrosion-resistant and/or high strength (CR/HS).	a. mechanical resin application. b. manual resin application.	113 lb/ton. 171 lb/ton.
6. open molding_gel coat \3\....	a. tooling gel coating. b. white/off white pigmented gel coating. c. all other pigmented gel coating. d. CR/HS or high performance gel coat. e. fire retardant gel coat. f. clear production gel coat.	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

\1\ Organic HAP emissions limits for open molding and centrifugal

casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

\3\ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

**Table 4 to Subpart WWWW of Part 63—Work Practice Standards**

As specified in §63.5805, you must meet the work practice standards in the following table that apply to you:

Table 4 to Subpart WWWW of Part 63._Work Practice Standards	
For . . .	You must . . .
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation.	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
6. all mixing or BMC manufacturing operations\1\.	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations\1\.	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations\1\.	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
\1\ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.	

**Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type**

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, you may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

Table 7\_to Subpart WWWW of Part 63.\_Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

If your facility has the following resin type and application method . . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . . .	is . . . .
2. CR/HS resins, nonatomized mechanical.	a. CR/HS filament application.	46.4
	b. CR/HS manual.....	46.4
5. non-CR/HS resins, nonatomized mechanical.	a. non-CR/HS manual.	38.5
	b. non-CR/HS centrifugal casting 1 2.	38.5

\3\ Nonatomized mechanical application must be used.

**Table 8 to Subpart WWWW of Part 63—Initial Compliance With Organic HAP Emissions Limits**

As specified in §63.5860(a), you must demonstrate initial compliance with organic HAP emissions limits as specified in the following table:

Table 8 to Subpart WWWW of Part 63.\_Initial Compliance With Organic HAP Emissions Limits

For . . . .	That must meet the following organic HAP emissions limit . . . .	You have demonstrated initial compliance if . . . .
1. open molding and centrifugal casting operations.	a. an organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average 1

year after the appropriate compliance date, and/or

ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or

iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

2. open molding centrifugal casting, continuous lamination/casting, SMC and BMC manufacturing, and mixing operations.	a. reduce total organic HAP emissions by at least 95 percent by weight.	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.
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**Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards**

As specified in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

Table 9 To Subpart WWWW of Part 63.\_Initial Compliance With Work Practice Standards

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that	the owner or operator submits a certified statement in the

styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.

notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.

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3. a new or existing materials HAP-containing materials storage operation.

keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

the owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

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7. an existing mixing or BMC manufacturing operation.

not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety.

the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.

---

8. a new or existing mixing or BMC manufacturing operation.

keep the mixer covers closed during mixing except when adding materials

the owner or operator submits a certified statement in the notice of

to the mixing vessels. compliance status that mixers closed except when adding materials to the mixing vessels.

**Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications**

As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).

**Table 14 to Subpart WWWW of Part 63—Requirements for Reports**

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in § 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the	Semiannually according to the requirements in §63.5910(b).

- reporting period.
- b. The information in § 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the information in § 63.5910(e). Semiannually according to the requirements in §63.5910(b).
- c. The information in § 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan. Semiannually according to the requirements in § 63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.
- a. Actions taken for the event By fax or telephone within 2 working days after starting actions inconsistent with the plan.
- b. The information in §63.10(d)(5)(ii). By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii))
-

## **Compliance Dates and Standards**

### **Testing and Initial Compliance Requirements**

#### **E.1.3 One Time Deadlines Relating to NESHAP: Reinforced Plastic Composites Production**

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- (a) Pursuant to 40 CFR 63.5800, the Permittee shall demonstrate compliance with the standards in 40 CFR 63, Subpart WWWW by April 21, 2006.
- (b) The Permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) no later than May 21, 2006.
- (c) The Permittee shall submit the first compliance report required by 40CFR 63.5910(a) no later than July 31, 2006.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: MAAX Bremen  
Source Address: 1010 West Dewey St., Bremen, Indiana 46506  
Mailing Address: 1010 West Dewey St., Bremen, Indiana 46506  
Part 70 Permit No.: T099-20996-00020

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: MAAX Bremen  
Source Address: 1010 West Dewey St., Bremen, Indiana 46506  
Mailing Address: 1010 West Dewey St., Bremen, Indiana 46506  
Part 70 Permit No.: T099-20996-00020

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)  |
| <input checked="" type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and                    |
| <input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: MAAX Bremen  
 Source Address: 1010 West Dewey St., Bremen, Indiana 46506  
 Mailing Address: 1010 West Dewey St., Bremen, Indiana 46506  
 Part 70 Permit No.: T099-20996-00020  
 Facility: Reinforce Fiberglass Manufacturing facility  
 Parameter: VOC Emissions: VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.  
 Limit: Less than two hundred fifty (250) tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

## PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: MAAX Bremen  
 Source Address: 1010 West Dewey St., Bremen, Indiana 46506  
 Mailing Address: 1010 West Dewey St., Bremen, Indiana 46506  
 Part 70 Permit No.: T099-20996-00020

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Title V Operating Permit Renewal

Source Name: MAAX Bremen  
 Source Location: 1010 West Dewey Street, Bremen, Indiana 46506  
 County: Marshall  
 SIC Code: 3088  
 Operation Permit No.: T099-20996-00020  
 Permit Reviewer: Alfred C. Dumauual, Ph.D.

On March 10, 2006, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that MAAX Bremen had applied for a Title V Operating Permit Renewal to continue to operate a stationary fiberglass component manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

1. On the cover page of the permit, the signature block has been updated to reflect the current Permits Branch Chief.

Operation Permit No.: T099-20996-00020	
Issued by: <del>Paul Dubenetzky, Assistant Commissioner</del> <b>Nisha Sizemore, Chief</b> <b>Permits Branch</b> Office of Air Quality	Issuance Date:  Expiration Date:

2. Condition B.9 (Annual Compliance Certification) has been revised to reflect the correct Annual Compliance Certification submittal date.

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than ~~April 15~~ **July 1** of each year to:

Indiana Department of Environmental Management  
 Compliance Branch, Office of Air Quality  
 100 North Senate Avenue  
 Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

3. The word "in" will be removed from the second sentence to be consistent with 326 IAC 2-7-15(a).

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

4. Condition C.16 (Emission Statements) was revised to reflect the appropriate requirements for this source under 326 IAC 2-6.

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- ~~(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

- ~~(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~
- ~~(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.~~

~~\_\_\_\_\_ The statement must be submitted to:~~

~~Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2254~~

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

- ~~(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall

**contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

**The statement must be submitted to:**

**Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

5. Condition D.1.2 (Volatile Organic Compounds) was revised to clarify BACT conditions.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the reinforced fiberglass manufacturing facilities are subject to the requirements of 362 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control volatile organic compound (VOC) emissions.

~~Operating~~ **BACT** conditions for the reinforced fiberglass manufacturing facilities shall be the following:

6. Condition D.1.4 was removed from the permit because the uncontrolled PM/PM-10 emissions from the trimming operation in combination with the controlled surface coating PM/PM-10 emissions yields PM and PM-10 emissions to less than 250 tons per year, rendering the requirements of 326 IAC 2-2 (PSD) not applicable.

~~D.1.4 Particulate Matter Emission (PM) Limitations [326 IAC 2-2]~~

~~In order to render the requirements of 326 IAC 2-2 not applicable, the potential to emit of PM is limited as follows:~~

- ~~(1) PM emissions from the trim area shall not exceed 13.7 lbs/hour;~~
- ~~(2) PM emissions from all surface coating activities combined shall not exceed 54.8 lbs/hour.~~

7. Condition B.13 (Prior Permits Superseded) was revised using the correct permit number to which this condition applies.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to ~~T039-20446-00110~~ **T099-20996-00020** and issued pursuant to permitting programs approved into the state implementation plan have been either:

...

7. Condition D.1.10 [*Renumbered as Condition D.1.7*] (Volatile Organic Compounds), was modified for clarity.

**~~D.1.10~~ D.1.7 Volatile Organic Compounds (VOC)**

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Compliance with the VOC emission limitations contained in Conditions D.1.2 and D.1.3 shall be determined as follows. ~~The Permittee shall obtain~~ from the manufacturer's the Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst and solvent used in the fiberglass composite manufacturing operations. The VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.

8. Under D.1.12 [*Renumbered as Condition D.1.8*] (Particulate Control), reference to Condition D.1.4 was deleted because Condition D.1.4 has been removed from the permit.

**~~D.1.12~~ D.1.8 Particulate Control**

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In order to comply with the requirements of Conditions ~~D.1.4 and D.1.8~~ **D.1.2 and D.1.3**, the dry filters shall control particulate emissions from the surface coating operations and the trim area at all times that the surface coating operations and the trim area are in operation.

9. Condition referenced in Condition D.1.14(a) [*Renumbered as D.1.11*] (Record Keeping Requirements) were corrected as follows:

**~~D.1.15~~ D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Conditions ~~D.1.3 and D.1.4~~ **D.1.2 and D.1.3**, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions ~~D.1.3 and D.1.4~~ **D.1.2 and D.1.3**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

...

11. Condition D.1.16(a) [*Renumbered as D.1.12*] was corrected to reference the correct portion of Condition D.1.2.

**~~D.1.16~~ D.1.12 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.2(a) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. Condition D.1.4 (Emissions Standards for Reinforced Plastics Composites Fabricating Emission Units) and Condition D.1.5 (Work Practice Standards for Reinforced Plastic Composites Fabrication) were removed from the Permit as they are no longer applicable after April 21, 2006.

~~D.1.4 Emissions Standards for Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25-3]~~

~~Pursuant to 326 IAC 20-25-1(d), the Permittee shall comply with the following requirements in 326 IAC 20-25-3 until April 21, 2006, when this source becomes subject to 326 IAC 20-56 and 40 CFR 63, Subpart WWWW.~~

- ~~(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
<i>Resin, Manual or Mechanical Application</i>	
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
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
<i>Gel Coat Application</i>	
Production Pigmented	37
Clear Production	44
Tooling	45
Production Pigmented, subject to ANSI <sup>®</sup> standards	45
Production Clear, subject to ANSI <sup>®</sup> standards	50

<sup>®</sup>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.1.11 is sufficient for demonstrating compliance with the HAP monomer content limits.~~

~~Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) 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, 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. (tons)

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category. (lbs of monomer per ton of resin or gel coat)

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

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

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.

D.1.5 — Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-1(d), the Permittee shall comply with the following work practice standards from 326 IAC 20-25-4 until April 21, 2006, when this source becomes subject to 326 IAC 20-56 and 40 CFR 63, Subpart WWWW.

- (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.

13. Condition D.1.10 (Hazardous Air Pollutants) and Condition D.1.15(b) (Reporting Requirements) [*Renumbered as D.1.12*] were removed from the Permit as both were contingent on Condition D.1.4 (Emissions Standards for Reinforced Plastics Composites Fabricating Emission Units) which was removed from the Permit (See comment #12)

~~D.1.10 Hazardous Air Pollutants (HAP)~~

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~~Compliance with the HAP monomer content limitations in Condition D.1.4 shall be determined by one 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 (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) 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 (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.~~~~
- ~~(d) An alternate method approved by IDEM, OAQ.~~

~~D.1.1512 Reporting Requirements~~

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~~...~~

- ~~(b) Sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.4(a) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~...~~

14. Condition D.1.14 (b) (Record Keeping Requirements) [*Renumbered as D.1.11*] was removed from the Permit as it was contingent on Condition D.1.5 (Work Practice Standards for Reinforced Plastic Composites Fabrication) which was removed from the Permit (See comment #12)

~~D.1.1411 Record Keeping Requirements~~

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~~...~~

- ~~(b) To document compliance with Condition D.1.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - ~~(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP monomer content of each resin or gel coat;~~~~

- ~~(2) — A log of the dates of use;~~
- ~~(3) — Method of application and other emission reduction techniques for each resin and gel coat used;~~
- ~~(4) — Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.~~

...

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>MAAX Bremen</b>
<b>Source Location:</b>	<b>1010 West Dewey Street, Bremen, Indiana 46506</b>
<b>County:</b>	<b>Marshall</b>
<b>SIC Code:</b>	<b>3088</b>
<b>Operation Permit No.:</b>	<b>T099-5049-00020</b>
<b>Operation Permit Issuance Date:</b>	<b>December 28, 2000</b>
<b>Permit Renewal No.:</b>	<b>099-20996-00020</b>
<b>Permit Reviewer:</b>	<b>Alfred C. Dumauual, Ph.D.</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from MAAX Bremen relating to the production of the fiberglass reinforced plastic bathtubs and showers. This facility was formerly known as "MAAX Midwest", but is now known as "MAAX Bremen" as requested by the source.

**Source Definition**

This Source Definition from the previous Part 70 Operating Permit was incorporated into this permit as follows:

This manufacturing company consists of eleven (11) buildings that include two (2) plant production areas. All eleven (11) buildings are located at 1010 West Dewey Street, Bremen, Indiana. Since all eleven (11) buildings are located on contiguous property, have the same SIC codes and are owned by one (1) company, the MAAX Corporation, they will be considered as one (1) source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Plant 1: One (1) fiberglass operation consisting of:
  - (1) Two (2) FRP chop guns operated by robotics and two (2) FRP chop guns operated by employee for backup/reinforced usage identified as fiberglass chop area, exhausting through vents identified as E-6 through dry filters.
  - (2) The Plant 1 fiberglass trim area has five dust collection systems (CD-1, CD-2, CD-3, CD-4 and CD-5) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two (2) gel spray booths, one (1) gelcoat gun operated by robotics and one (1) gelcoat gun operated by employee to produce all non-white colors using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through dry filters and venting through E-2.

- (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment and used in the fiberglass operation.
  - (8) Mixing operations
- (b) Plant 2: One (1) fiberglass operation consisting of:
- (1) Three (3) FRP chop guns operated by employee, identified as fiberglass chop shop area, one station exhausting through dry filters and venting through vents identified as E-2, E-3, E-4, E-5 and E-16.
  - (2) One (1) fiberglass trim area has four dust collection systems (CD-1, CD-2, CD-3 and CD-4) which do not vent to outside air, but rather collect and filter dust and send filtered air back into the plant.
  - (3) Fiberglass gel area consisting of two gelcoat guns operated by employee using methyl ethyl ketone peroxide (MEKP) as a catalyst exhausting through three exhaust fans (E10, E11 and E12) vice four. These three fans exhaust air through two filtered dog houses.
  - (4) Mold Prep and Repair
  - (5) Maintenance Area
  - (6) Area also includes a final finish area where defects are repaired using a one-quart touch up gun to apply gelcoat.
  - (7) Acetone solvent is used for the cleanup of tools and equipment used in the fiberglass operation.
  - (8) Mixing operations

Under NESHAP WWWW, Plants 1 and 2 are considered an existing affected source.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
- (b) Paved and unpaved roads and parking lots with public access
- (c) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of volatile organic compounds (VOC).

- (1) One (1) 7700 gallon, above ground, vertical volatile organic liquid compound storage tank containing resin.
  - (2) One (1) 550 gallon neat resin mixing tank with an 80% closed lid system. This tank is used for mixing the neat resin material with the filler.
  - (3) One (1) 660 gallon resin day tank. This used to pump the mixed resin/filler to the pump.
  - (4) One (1) 55 gallon gelcoat mixer open lid type used in mixing gelcoats prior application.
- (d) Other activities of categories not previously identified:

**Insignificant Thresholds:** Activities with emissions equal to or less than thresholds require listing only.

Lead(Pb) = 0.6 tons/year or 3.29 lbs/day                      Carbon Monoxide (CO) = 25 lbs/day  
Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day          Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day  
Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day          Volatile Organic Compounds = 3lbs/hour or 15 lbs/day

- (1) Touch up painting
- (2) Waxing of molds

### Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) TV 099-5049-00020, issued on December 28, 2000
- (b) Administrative Amendment 099-14841-00020, issued on September 5, 2006

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit renewal application for the purposes of this review was received on March 29, 2005.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 and 2).

**Potential to Emit of the Source**

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.”

The source was issued a Part 70 Operating Permit on December 28, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Manufacturing	>100 <250	>100 <250	<100	>100 <250	<100	<100	>25
Total PTE	>100 <250	>100 <250	<100	>100 <250	<100	<100	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	No Data
PM-10	No Data
SO <sub>2</sub>	No Data
VOC	159.14
CO	No Data

NO <sub>x</sub>	No Data
HAP	No Data

### County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Marshall County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. 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<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (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.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-8, (40 CFR 63.19375, Subpart WWWW).
- (c) The fiberglass operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-8, (40 CFR 63.340, Subpart WWWW). The resins and gel coats contain styrene and are applied and cured using the open molding process with emissions of styrene equal to or greater than three (3) tons per year. Non applicable portions of the NESHAP will not be included in the permit. The Permittee has conducted all initial testing and notifications.

Non applicable portions of the NESHAP will not be included in the permit. The fiberglass operation is subject to the following portions of Subpart WWWW:

- (1) 40 CFR 63.5785 (a)
- (2) 40 CFR 63.5790 (a), (b) and (c)
- (3) 40 CFR 63.5795 (b)
- (4) 40 CFR 63.5796
- (5) 40 CFR 63.5797
- (6) 40 CFR 63.5799 (b)(1) and (c)
- (7) 40 CFR 63.5800
- (8) 40 CFR 63.5805 (b), (g) and (h)
- (9) 40 CFR 63.5810 (b) and (d)
- (10) 40 CFR 63.5835
- (11) 40 CFR 63.5840
- (12) 40 CFR 63.5860 (a)
- (13) 40 CFR 63.5895 (b), (c) and (d)
- (14) 40 CFR 63.5900 (a)(2), (a)(3), (a)(4)(b) and (a)(4)(c)
- (15) 40 CFR 63.5905 (a)
- (16) 40 CFR 63.5910 excluding section (e)
- (17) 40 CFR 63.5915 excluding section (b)

- (18) 40 CFR 63.5920
- (19) 40 CFR 63.5925
- (20) 40 CFR 63.5930
- (21) 40 CFR 63.5935
- (22) Table 1 Open molding operation
- (23) Table 2 Compliance date for existing source
- (24) Table 3 Open molding operation
- (25) Table 4 Existing operation for cleaning, storage and mixing
- (26) Table 7 Nonatomized mechanical application of resin
- (27) Table 8 open molding operations
- (28) Table 9 Existing operation for cleaning, storage and mixing
- (29) Table 13 Notifications for existing Source
- (30) Table 14 Compliance reporting

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

- (d) The source is not subject to the provisions of 40 CFR 63, PPPP because the facility is considered a gel coating operation in the manufacture of reinforced plastic composite parts as defined in 40 CFR 63.4481(c)(6).

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

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

This source is not subject to the requirements of 326 IAC 2-2 (PSD) because the potential to emit of all attainment pollutants except particulate matter (PM) and volatile organic compounds (VOCs) is less than 250 tons per year. The total source usage of VOCs shall be limited such that VOC emissions are less than 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The potential to emit of PM is limited to less than 250 tons per year as follows:

- (1) PM emissions from the trim area shall not exceed 13.7 lbs/hour,
- (2) PM emissions from surface coating activities shall not exceed 54.8 lbs/hour.

This source uses dry filters to comply with these limits. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) will not apply.

##### **326 IAC 2-6 (Emission Reporting)**

This source is located in Marshall county and is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6 (a)(1), this source shall submit an annual emission statement covering the previous calendar year to the Office of Air Quality (OAQ) by July 1<sup>st</sup> of each year.

##### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

This source is a major source of hazardous air pollutants (HAPs). However, this source received all necessary permits for construction prior to July 21, 1997. Therefore, 326 IAC 2-4.1 does not apply to the source.

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) 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.
- (b) 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

#### 326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, the fiberglass showers, tubs and sinks manufacturing operations is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for this source shall be:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats shall be less than 250 tons per year. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by

IDEM, OOAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppressions, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) – [(Emissions from <35% resin or 37% gel coat) \* (Emissions from 35% resin or 37% gel coat)] - (Emissions from <35% resin, <37% gel coat, and/or other emission reduction techniques).

Where: Emissions (lbs or ton) = M \* EF  
M is the mass of resin or gel coat used in lbs or tons;  
EF is the monomer emission factor for resin or gel coat used, %);  
EF as the monomer emission factor is expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques included, but are no limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installed a control device.
- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats, and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques included, but are not limited to, the use of airless, ais-assisted airless, high volume lower pressue (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressured measured dynamically at the center of the air cap and at the air horns of the spray system.

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

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

326 IAC 6-3-2 (Particulate Emissions Limitations)

Pursuant to 326 IAC 6-3-2(d), surface coating operations and reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with the manufacturer's specifications

326 IAC 20-25-3 (Emissions Standards for Reinforced Plastics Composites Fabricating Emission Units)

Pursuant to 326 IAC 20-25-1(d), the Permittee shall comply with the following requirements in 326 IAC 20-25-3 until April 21, 2006, when this source becomes subject to 326 IAC 20-56 and 40 CFR 63, Subpart WWWW.

- (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
<i>Resin, Manual or Mechanical Application</i>	
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
Production, Class I, Flame and Smoke Shrinkage Controlled	60*
Tooling	52
	43
<i>Gel Coat Application</i>	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI <sup>a</sup> standards	45
Production-Clear, subject to ANSI <sup>a</sup> standards	50

<sup>a</sup> 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.1.14 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) 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, 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. (tons)

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category. (lbs of monomer per ton of resin or gel coat)

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls. (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.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

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.

#### 326 IAC 20-25-4 (Work Practice Standards for Reinforced Plastic Composites Fabrication)

Pursuant to 326 IAC 20-25-1(d), the Permittee shall comply with the following work practice standards from 326 IAC 20-25-4 until April 21, 2006, when this source becomes subject to 326 IAC 20-56 and 40 CFR 63, Subpart WWWW.

- (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.

326 IAC 20-25-8 (Operator Training for Reinforced Plastic Composites Fabrication) [326 IAC 20-56-2]

- (a) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications shall be trained according to the following schedule:
- (1) All new personnel hired shall be trained within fifteen (15) days of hiring.
  - (2) To ensure training goals listed in paragraph (b) of this condition are maintained, all personnel shall be given refresher training annually.
  - (3) Personnel who have been trained by another Permittee subject to 326 IAC 20-25 or 326 IAC 20-56 are exempt from the requirement of paragraph (a)(1) of this condition if written documentation that the employee's training is current is provided to the new employer.
  - (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (b) 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.
- (c) The Permittee 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.

### 326 IAC 20-56 (Reinforced Plastic Composites Production)

This rule applies to sources as provided in 40 CFR 63.5785, Subpart WWWW. The requirements of 40 CFR 63.5780, Subpart WWWW are included in Section E.1 of the permit. See the Federal Rule Applicability for the applicable requirements.

On August 25, 2005, US EPA issued revisions to 40 CFR 63, Subpart WWWW as published in the Federal Register of August 25, 2005. The revisions to the NESHAP have not yet been approved into the Indiana State Implementation Plan (SIP). Hence, in order to be in compliance with this rule, the source has to comply with the version of 40 CFR 63, Subpart WWWW that existed prior to the revised rule published in the Federal Register on August 25, 2005. Therefore, condition D.1.16 has been added to the Title V permit and includes only the sections of the previous version of Subpart WWWW that were revised on August 25, 2005.

Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following operator training requirements:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
  - (1) All personnel hired shall be trained within thirty (30) days of hiring.
  - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) 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.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
  - (1) A copy of the current training program.
  - (2) A list of the following:
    - (A) All current personnel, by name, that are required to be trained.
    - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

## 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 in 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.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The fiberglass showers, tubs and sinks manufacturing operation have applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. Failure to take response steps in accordance with with Section C - Response to Excursions or Exceedences, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions or when evidence of overspray is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedences, shall be considered a deviation of this permit.
  - (3) Visible Emission Notations
    - (A) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
    - (B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (C) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (E) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedences shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters and dust collection systems for the fiberglass operation must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions), 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

### **Conclusion**

The operation of this fiberglass manufacturing facility shall be subject to the conditions of this Part 70 permit 099-20996-00020.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: MAAX Bremen**  
**Address City IN Zip: 1010 West Dewey Street, Bremen, Indiana 46506**  
**Permit Number: T099-20996-00020**  
**Plt ID: 099-00020**  
**Reviewer: Alfred C. Dumauval, Ph.D.**  
**Date: February 10th, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Plant 1</b>																
Resin	9.0	46.00%	0.0%	46.0%	0.0%	32.00%	4.14000	48.030	4.14	4.14	823.21	19757.16	3605.68	1058.19	12.94	75%
Gel Coat	10.8	32.00%	0.0%	32.0%	0.0%	48.00%	3.47000	15.000	3.47	3.47	180.55	4333.22	790.81	420.12	7.23	75%
Catalyst	9.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.07000	1.460	9.31	9.31	0.95	22.84	4.17	0.00	0.00	75%
Acetone	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.20000	0.000	6.52	6.52	0.00	0.00	0.00	0.00	0.00	0%
<b>Plant 2</b>																
Resin	9.0	46.00%	0.0%	46.0%	0.0%	32.00%	4.14000	48.030	4.14	4.14	823.21	19757.16	3605.68	1058.19	12.94	75%
Gel Coat	10.8	32.00%	0.0%	32.0%	0.0%	48.00%	3.47000	15.000	3.46	3.46	179.88	4317.24	787.90	418.57	7.20	75%
Catalyst	9.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.07000	1.460	9.31	9.31	0.95	22.84	4.17	0.00	0.00	75%
Acetone	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.01000	2.000	6.52	6.52	0.13	3.13	0.57	0.00	0.00	0%

**Potential Emissions from Surface Coating**

<b>Uncontrolled Emissions:</b>	<b>2008.90</b>	<b>48213.58</b>	<b>8798.98</b>	<b>2955.07</b>
<b>Controlled Emissions (w/Control Efficiency of 98%):</b>				<b>59.10</b>

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used

**Company Name:** MAAX Bremen  
**Address City IN Zip:** 1010 West Dewey Street, Bremen, Indiana 46506  
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### Calculations for PM Emissions from Trim area

**Potential PM from Trim area:**

$$\frac{46\text{lbs} - \text{PM}}{8\text{hrs}} \times 8760 \text{ hrs/yr} \times \frac{1\text{ton}}{2000\text{lbs}} \times \frac{100 \text{ tons emitted}}{75 \text{ tons collected}} = 33.6 \text{ tpy PM from trim area}$$

\*Based on information from Permittee: 46 lbs of PM is collected in 8hrs on the dry filters which have a 75% control efficiency, when operating at maximum capacity

**Controlled PM emissions from Trim area:**

$$\frac{46\text{lb}}{8\text{hrs}} \times 8760 \text{ hrs/yr} \times \frac{1\text{ton}}{2000\text{lbs}} = 25.2 \text{ tpy PM from trim area}$$