



*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](http://www.IN.gov/idem)

TO: Interested Parties / Applicant  
DATE: May 9, 2005  
RE: Better Way Partners / 039-21091-00141  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

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

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

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

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

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

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

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

Enclosures  
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

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Mr. Bruce Korenstra  
Better Way Partners LLC, dba Better Way Products, Inc.  
70891 C. R. 23  
New Paris, Indiana 46553

May 9, 2005

Re: 039-21091-00141  
Minor Source Modification to  
Part 70 No.: T 039-7106-00141

Dear Mr. Korenstra:

Better Way Partners LLC, dba Better Way Products, Inc. was issued a Part 70 permit on December 30, 1999 for a fiberglass lamination production plant. An application to modify the source was received on April 5, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) Gelcoat Booth, identified as P1-G3 with a maximum production capacity of 160 small parts per day, equipped with air assisted airless spray application system, exhausting to stack S16. Particulate overspray will be controlled by dry filters.
- (b) One (1) Resin Booth, identified as P1-R2 with a maximum production capacity of 160 small parts per day, equipped with air-assisted airless spray application system, exhausting to stack S15. Particulate overspray will be controlled by dry filters.

The following construction conditions are applicable to the proposed project:

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

construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments

APD

cc: File -Elkhart County  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section  
Administrative and Development



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 Governor

Thomas W. Easterly  
 Commissioner

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

**Better Way Partners LLC dba Better Way Products, Inc.  
 70891 C.R. 23  
 New Paris, Indiana 46553**

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

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

Minor Source Modification.: T039-21091-00067	
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: May 9, 2005

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

#### Plant 1:

- (a) One (1) Gelcoat Booth, identified as P1-G3 with a maximum production capacity of 160 small parts per day, equipped with air assisted airless spray application system, exhausting to stack S16. Particulate overspray will be controlled by dry filters.
- (b) One (1) Resin Booth, identified as P1-R2 with a maximum production capacity of 160 small parts per day, equipped with air-assisted airless spray application system, exhausting to stack S15. Particulate overspray will be controlled by dry filters.

(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 Single HAP Minor Source Modification Limit [326 IAC 2-7-10.5(d)(4)]

The total potential to emit of single HAP from the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) shall be limited to less than 10 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-7-10.5(f), Significant Source Modification not applicable. HAP emissions from resin and gelcoat shall be calculated from HAP applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

HAP emissions from coatings, dilution coatings and cleaning solvents where no cross linking reaction occurs in the process shall be calculated using the following method:

Emissions, lb or ton = M (mass of coatings, dilution coatings or cleaning solvents used, lb or ton) \* weight % HAP \* 100 % flash off

#### D.1.2 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule, including:

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

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, manual or mechanical application	
Production - Specialty products	48
Production - Non-corrosion resistant unfilled	38
Production - Non-corrosion resistant filled	35
Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet	42
Production - Class I, Flame and Smoke	60
Shrinkage controlled	52
Tooling	43
Gelcoat application	
Production - Pigmented	37
Clear production	44
Tooling	45
Production - pigmented, subject to ANSI standards	45
Production - clear, subject to ANSI standards	50

- (b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:
- (1) Production noncorrosion resistant, unfilled resins from all sources.
  - (2) Production, specialty products resins from all sources.
  - (3) Tooling resins used in the manufacture of water craft.
  - (4) Production resin used for Class I flame and smoke products.
- (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.
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category 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, 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. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:

For Averaging within a category:

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

Where:

$M_R$  = Total monthly mass of material within each category

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

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

(e) To determine emission estimates, the following references or methods shall be used:

- (1) "Unified Emission Factors for Open Molding of Composites", July 23, 2001, except use of controlled spray emission factors must be approved by the commissioner.
- (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.
- (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52, Subpart]

(a) Pursuant to 40 CFR 52, Subpart P, the particulate matter emission from the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Pursuant to 326 IAC 6-3-2, the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) shall be controlled by a dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

Pursuant to 326 IAC 20-25-4 (Work Practices Standards), the Permittee shall operate in accordance with the following work practices standards:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in subsection (g), HAP containing materials shall be in a closed container when not in use.
- (c) Solvent 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 when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.
- (h) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no HAPs. However, 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 subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

### **Compliance Determination Requirements**

#### **D.1.6 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]**

Pursuant to 326 IAC 20-25-8 (Operator Training):

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

- (a) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

**D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326IAC 2-1.1-11] [326 IAC 20-25-5]**

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Compliance with the HAP monomer content limitations in Condition D.1.3 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 one 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 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 alternative method approved by IDEM/OAQ.
- (e) When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with this rule.

**D.1.8 HAP Emissions**

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Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile HAP usage for the most recent twelve (12) month period.

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

**D.1.9 Monitoring**

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- (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 (S1, S2, S3, S4, S7, S8, S11, S12, and S13) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

**D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP monomer usage limits and/or the HAP monomer emission limits established in Condition D.1.1 and D.1.2.
  - (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) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and

- those used as cleanup solvents;
- (2) A log of the dates of use;
  - (3) The non-acetone cleanup solvent usage for each month;
  - (4) The total HAP usage for each month; and
  - (5) The weight of HAP emitted for each compliance period.
  - (6) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) 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 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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.

If using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.2 the Permittee 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
Part 70 Quarterly Report**

Source Name: Better Way Partners LLC, dba Better Way Products, Inc.  
Source Address: 70891 C. R. 23, New Paris, IN 46996  
Mailing Address: 70891 C. R. 23, New Paris, IN 46996  
Part 70 Permit No.: 039-7106-00141  
Facility: Small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3)  
Parameter: Hazardous Air Pollutants  
Limit: Less than 10 tons of single HAP per 12 consecutive month period

QUARTER: \_\_\_\_\_ 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.

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

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

**Source Background and Description**

Source Name:	Better Way Partners LLC dba Better Way Products, Inc.
Source Location:	70891 C. R. 23, New Paris, IN 46996
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T039-7106-00141
Operation Permit Issuance Date:	December 30, 1999
Minor Source Modification No.:	039-21091-00141
Minor Permit Modification No.:	039-21115 -00141
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Better Way Products, Inc., relating to the construction and operation of the following emission units to be used specifically in Plant 1 as small parts production area:

- (a) One (1) Gelcoat Booth, identified as P1-G3 with a maximum production capacity of 160 small parts per day, equipped with air assisted airless spray application system, exhausting to stack S16. Particulate overspray will be controlled by dry filters.
- (b) One (1) Resin Booth, identified as P1-R2 with a maximum production capacity of 160 small parts per day, equipped with air-assisted airless spray application system, exhausting to stack S15. Particulate overspray will be controlled by dry filters.
- (c) Ten feet extension of the grinding booth wall to improve the operator efficiency and an extra exhaust stack (S14) will be added. This extension will not result in an increase in production or emissions.

**History**

Better Way Products, Inc. was issued a Part 70 permit on December 30, 1999. On April 5, 2005, Better Way Products, Inc. submitted an application to modify the source.

**Existing Approvals**

The source was issued a Part 70 Operating Permit T039-7106-00141 on December 30, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 039-12115, issued on July 6, 2000;
- (b) First Significant Permit Modification No.: 039-12527, issued on November 2, 2000;
- (c) First Reopening No.: 039-13212, issued on November 1, 2001;

(d) Second Significant Permit Modification No.: 039-17623, issued on July 25, 2003; and

(e) Third Significant Permit Modification No.: 039-17869-00141, issued on October 9, 2003.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation
S15	Resin Booth
S16	Gelcoat Booth

### Recommendation

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

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

### Emission Calculations for Modifications

Resin and Gelcoat Booths: See Page 1 of 1 TSD Appendix A for detailed emission calculations.

### Potential To Emit of Modification

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

Pollutant	Potential To Emit (tons/year)
PM	63.98
PM-10	63.98 <sup>1</sup>
SO <sub>2</sub>	0.0
VOC	14.2
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Styrene	14.2 but limited to <10
TOTAL	14.2 but limited to <10

### Justification of the Modification

(a) (1) The Part 70 source is being modified through a Minor Source Modification,

pursuant to 326 IAC 2-7-10.5(d) (4). The modification has a potential to emit single HAP of ten (10) tons per year or greater, but will be limited below ten (10) tons per year; and

- (2) The Part 70 source is being modified through a Minor Source Modification, pursuant to 326 IAC 2-7-10.5(d) (8). The modification will add emission units with PM and PM10 greater than 25 tons per year but are of the same types that are already permitted and will comply with the same applicable requirements
- (b) The Part 70 permit is being modified through a Minor Permit Modification, pursuant to 326 IAC 2-7-12, since it is not required to be processed as a significant permit modification or as an administrative amendment.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-2.5	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour-Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standards. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset 326 IAC 2-3.
- (b) Elkhart County has been classified attainment or unclassifiable for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (c) Elkhart County has been classified attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year, taken from the Significant Source Modification No.: 039-17829-00141, issued September 22, 2003):

Pollutant	Emissions (tons/year)
PM	110.4
PM-10	110.4
SO <sub>2</sub>	0.014
VOC	249.0
CO	0.615
NO <sub>x</sub>	2.33

- (a) This existing source is a major stationary source for VOC under 326 IAC 2-3, Emission Offset because VOC is emitted at greater than 100 tons per year.
- (b) This existing source is not a major stationary source under 326 IAC 2-2, Prevention of Significant Deterioration because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

**Potential To Emit After Issuance of Permit**

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.”

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
New small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3)	6.4	6.4	0.0	14.2	0.0	0.0	<10single HAP
PSD Threshold Levels	250	250	250	-	250	-	-
Emission Offset Significant Level	-	-	-	40	-	100	-

- (a) This modification to an existing major source under 326 IAC 2-3, is not major for VOCs because emission increase is less than 40 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) This modification to an existing minor source under 326 IAC 2-2, is not major for PM or PM10 because each emissions are less than 250 tons per year. Therefore, pursuant to

326 IAC 2-2, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63)  
40 CFR 63, Subpart WWWW  
The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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

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

- (1) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (2) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (3) If complying by using an add-on control device, the Permittee shall submit:
  - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
  - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
  - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included for this proposed modification.

**State Rule Applicability - Entire Source**

- (a) 326 IAC 2-3 (Emission Offset)  
 The source is an existing major source for ozone under 326 IAC 2-3, Emission Offset. The VOC emissions from this modification are less than 40 tons per year. Therefore, this modification is not subject to the requirements of 326 IAC 2-3.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration)  
 This modification to an existing minor source under 326 IAC 2-2, is not major for PM or PM10 because each emissions are less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply
- (c) 326 IAC 5-1 (Visible Emissions 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 this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (d) 326 IAC 2-4.1-1 (New Source Toxics Control)  
 This rule applies to new or reconstructed major sources of HAPs built after July 27, 1997. This proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) will not be subject to 326 IAC 2-4.1, as this line will be limited to less than 10 tons per year for single HAP.

**State Rule Applicability - Individual Facilities**

- (a) 326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)  
 This rule is applicable to this new small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3), as it manufactures reinforced plastics composites that use resins and gel coats that contain styrene in open molding processes, and have actual emissions of greater than three (3) tons per year of styrene.  
  
 The source is already determined to be subject to the following requirements of 326 IAC 20-25:
  - (1) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, manual or mechanical application	
Production - Specialty products	48

Production - Non-corrosion resistant unfilled	38
Production - Non-corrosion resistant filled	35
Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet	42
Production - Class I, Flame and Smoke	60
Shrinkage controlled	52
Tooling	43
Gelcoat application	
Production - Pigmented	37
Clear production	44
Tooling	45
Production - pigmented, subject to ANSI standards	45
Production - clear, subject to ANSI standards	50

- (2) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:
- (i) Production noncorrosion resistant, unfilled resins from all sources.
  - (ii) Production, specialty resins from all sources.
  - (iii) Tooling resins used in the manufacture of water craft.
  - (iv) Production resin used for Class I flame and smoke products.
- (3) Unless specified in subsection (2), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (i) Nonatomized application technology.
  - (ii) Air-assisted airless.
  - (iii) Airless.
  - (iv) High volume, low pressure.
  - (v) Equivalent emission reduction technologies to subdivisions (ii) through (iv).
- (4) Cleaning operations for resin and gel coat application equipment are as follows:
- (i) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, 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.
  - (ii) 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.
  - (iii) 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.

- (5) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category 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, 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. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:

For Averaging within a category:

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

Where:

$M_R$  = Total monthly mass of material within each category

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

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

- (6) To determine emission estimates, the following references or methods shall be used:
- (i) "Unified Emission Factors for Open Molding of Composites", April 1999, except use of controlled spray emission factors must be approved by the commissioner.
  - (ii) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.
  - (iii) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.
- (b) Pursuant to 326 IAC 20-25-4 (Work Practices Standards):  
On or Before March 1, 2001, each owner or operator of a source or emission unit subject to this rule shall operate in accordance with the following work practices standards:
- (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
  - (2) Except for mixing containers as described in subsection (7), HAP containing materials shall be in a closed container when not in use.
  - (3) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.
  - (4) Solvent collection containers shall be kept closed when not in use.
  - (5) Clean-up rags with solvent shall be stored in closed containers.
  - (6) Closed containers shall be used for the storage of the following:
    - (i) All production and tooling resins that contain HAPs.
    - (ii) All production and tooling gel coats that contain HAPs.

- (iii) Waste resins and gel coats that contain HAPs.
  - (iv) Cleaning materials, including waste cleaning materials.
  - (v) Other materials that contain HAPs.
- (7) 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 when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.
- (8) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no HAPs. However, 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 subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
- (c) Pursuant to 326 IAC 20-25-8 (Operator Training):  
All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications ( for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
- (1) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.
  - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
  - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
  - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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.
- (d) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)  
This rule applies to new facilities as January 1, 1980, which have potential VOC emissions of 25 tons per year or greater that are not regulated by other provisions of this article, 326 IAC 8. The proposed small parts production area (P1-R2 and P1-G3 is not subject to this rule as its VOC potential emissions are less than 25 tons/year.
- (e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) is subject to 326 IAC 6-3-2, and shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to the following:

The Permittee shall operate the control device in accordance with manufacturer's

specifications.

The source is in compliance with this rule, as dry filters will be installed to control PM overspray emissions from the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3).

### Compliance Requirements

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

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

### CHANGES TO PART 70 PERMIT

The Part 70 permit is modified to incorporate the new small parts production area as follows (~~strikeout~~ to show deletions and **bold** to show additions):

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

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The Permittee owns and operates a fiberglass lamination production plant.

Responsible Official: Bruce Korenstra  
Source Address: 70891 C. R. 23, New Paris, Indiana 46553  
Mailing Address: 70891 C. R. 23, New Paris, Indiana 46553  
Phone Number: (574) -831-3340  
SIC Code: 3089  
County Location: Elkhart  
County Status: **Nonattainment for the 8-Hour Ozone**  
~~Attainment for all the other criteria pollutants~~  
~~Attainment for all other criteria pollutants~~  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act  
**Major Source, under Emission Offset Rules**  
~~Minor Source, under PSD Rules or Emission Offset Rules;~~

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

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

**Plant 2:**

- (a) Gelcoat booth, identified as P2-G, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack S4.
- (b) Resin chop area, identified as P2-R, with a maximum capacity of 322.1 pounds per hour,

using dry filters as control, and exhausting to stacks S7 and S8.

- (c) Gelcoat/resin chop application area, identified as P2-LTGR for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S2 and S3.
- (d) Grinding area, identified as P2-GRIND with two (2) grinders, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stacks S5 and S6.

**Plant 1:**

- (e) Two (2) gelcoat booths, known as P1-G1 and P1-G2, each equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively.
- (f) One (1) resin booth, known as P1-R, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13.
- (g) One (1) Gelcoat Booth, identified as P1-G3 with a maximum production capacity of 160 small parts per day, equipped with air assisted airless spray application system, exhausting to stack S16. Particulate overspray will be controlled by dry filters.**
- (h) One (1) Resin Booth, identified as P1-R2 with a maximum production capacity of 160 small parts per day, equipped with air-assisted airless spray application system, exhausting to stack S15. Particulate overspray will be controlled by dry filters.**
- (g) (i) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control, exhausting to stacks S9, and S10, and S14.
- (h) (j) One (1) Resin Transfer Molding (RTM) area, using a closed molding process, using 30,000 pounds per year of styreneated resins.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

**Plant 2:**

- (a) Gelcoat booth, identified as P2-G, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack S4.
- (b) Resin chop area, identified as P2-R, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S7 and S8.
- (c) Gelcoat/resin chop application area, identified as P2-LTGR for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S2 and S3.
- (d) Grinding area, identified as P2-GRIND with two (2) grinders, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stacks S5 and S6.

**Plant 1:**

- (e) Two (2) gelcoat booths, known as P1-G1 and P1-G2, each equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively.

- (f) One (1) resin booth, known as P1-R, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13.
- (g) One (1) Gelcoat Booth, identified as P1-G3 with a maximum production capacity of 160 small parts per day, equipped with air assisted airless spray application system, exhausting to stack S16. Particulate overspray will be controlled by dry filters.**
- (h) One (1) Resin Booth, identified as P1-R2 with a maximum production capacity of 160 small parts per day, equipped with air-assisted airless spray application system, exhausting to stack S15. Particulate overspray will be controlled by dry filters.**
- (g) (i) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control, exhausting to stacks S9 and S10.
- (h) (j) One (1) Resin Transfer Molding (RTM) area, using a closed molding process, using 30,000 pounds per year of styreneated resins.

(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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than 244 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. VOC emissions **from resin and gelcoat** shall be calculated from VOC applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \*  
EF (VOC monomer emission factor for resin or gel coat used, %)

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

**VOC emissions from coatings, dilution solvents and cleaning solvents where no cross linking reaction occurs in the process shall be calculated using the following method:**

**Emissions, lb or ton = M (mass of coatings, dilution solvents or cleaning solvents used, lb or ton) \* weight % organics \* 100 % flash off**

- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, July 23, 2001. The emission factors used for monomers that is styrene 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.

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

- (a) For Plant No. 2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6 (BACT).
- (b) For gelcoat spray booth P1-G1 and resin booth P1-R in Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC 2-4.1-1, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight. For gelcoat spray booth P1-G2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6.
- (c) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

*The following condition will be added in the Part 70 permit to incorporate applicable requirements for the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3). Subsequent conditions will be re-numbered accordingly:*

D.1.3 Single HAP Minor Source Modification Limit [326 IAC 2-7-10.5(d)(4)]

**The total potential to emit of single HAP from the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3 shall be limited to less than 10 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-7-10.5(f), Significant Source Modification not applicable. HAP emissions from resin and gelcoat shall be calculated from HAP applied to the applicators, using the following method:**

**Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \*  
EF (HAP monomer emission factor for resin or gel coat used, %);**

**EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.**

**HAP emissions from coatings, dilution coatings and cleaning solvents where no cross linking reaction occurs in the process shall be calculated using the following method:**

**Emissions, lb or ton = M (mass of coatings, dilution coatings or cleaning solvents used, lb or ton) \* weight % HAP \* 100 % flash off**

D.1.3 4 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule, including:

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

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, manual or mechanical application	
Production - Specialty products	48
Production - Non-corrosion resistant unfilled	38
Production - Non-corrosion resistant filled	35
Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet	42
Production - Class I, Flame and Smoke	60
Shrinkage controlled	52
Tooling	43
Gelcoat application	
Production - Pigmented	37
Clear production	44
Tooling	45
Production - pigmented, subject to ANSI standards	45
Production - clear, subject to ANSI standards	50

- (b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:
- (1) Production noncorrosion resistant, unfilled resins from all sources.
  - (2) Production, specialty products resins from all sources.
  - (3) Tooling resins used in the manufacture of water craft.
  - (4) Production resin used for Class I flame and smoke products.
- (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.
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category 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, 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. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:

For Averaging within a category:

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

Where:

$M_R$  = Total monthly mass of material within each category  
 $E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.  
 $Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls.

- (e) To determine emission estimates, the following references or methods shall be used:
- (1) "Unified Emission Factors for Open Molding of Composites", July 23, 2001, except use of controlled spray emission factors must be approved by the commissioner.
  - (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.
  - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

**D.1.45 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52, Subpart P]**

- (a) The PM from the fiberglass lamination production processes in Plant 1 and Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:
- Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$
- (b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations in Plant 2, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour, and the PM from the grinding operations in Plant 1 shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.
- The pounds per hour limitation was calculated with the following equation:
- Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$
- (c) Pursuant to 40 CFR 52, Subpart P, the particulate matter emission from the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) shall not exceed the pound per hour emission rate established as E in the

**following formula:**

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

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

**D.1.5 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 this facility and any control devices.

**D.1.6 7 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]**

Pursuant to 326 IAC 20-25-4 (Work Practices Standards), the Permittee shall operate in accordance with the following work practices standards:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in subsection (g), HAP containing materials shall be in a closed container when not in use.
- (c) Solvent 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 when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.
- (h) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no HAPs. However, 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 subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

**D.1.8 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

**Pursuant to 326 IAC 6-3-2, the proposed small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3) shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

**Compliance Determination Requirements**

**D.1.7 9 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]**

Pursuant to 326 IAC 20-25-8 (Operator Training):

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

- (a) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.

- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

*The following condition is no longer applicable and will be deleted.*

~~D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D 1.1 shall be determined by a performance test conducted in accordance with Section C Performance Testing.~~

~~D1.9 10 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] [326 IAC 20-25-5]~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~Compliance with the HAP monomer content limitations in Condition D.1.3 and 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 one 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 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 alternative method approved by IDEM/OAQ.
- (e) When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with this rule.

~~D.1.10 11 VOC and Single HAP Emissions~~

~~Compliance with Condition D.1.1, D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and single HAP usage for the most recent twelve (12) month period.~~

#### D.1.4112 Particulate Matter (PM)

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Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding area in Plant 2 is in operation. The dust collector shall be in operation at all times when the grinding area in Plant 1 is in operation.

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

#### D.1.42 13 Monitoring

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- (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 (S1, S2, S3, S4, S7, S8, S11, S12, and S13) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Response Plan - Failure to Take Response Steps~~, **Preparation, Implementation, Records, and Reports**, shall be considered a **deviation violation** from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Response Plan - Failure to Take Response Steps~~, **Preparation, Implementation, Records, and Reports**, shall be considered a **deviation violation** from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.1.43-14 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, D.1.2, ~~and D.1.3~~ **and D.1.4** the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP monomer usage limits and/or the VOC and HAP monomer emission limits established in Condition D.1.1, D.1.2, ~~and D.1.3~~ **and D.1.4**.
  - (1) ~~The amount and VOC and HAP monomer content of each resin and gel coat used content of each coating material and solvent used.~~ **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) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The non-acetone cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
  - (6) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition ~~D.1.12~~ **D.1.13**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  - (c) To document compliance with Condition ~~D.1.7~~ **D.1.9**, the permittee shall maintain the following training records:
    - (1) A copy of the current training program.
    - (2) A list of 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.14-16 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, 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.
- (b) If using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Conditions ~~D.1.3~~ **D.1.4 the Permittee** 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
Part 70 Quarterly Report**

**Source Name:** Better Way Partners LLC, dba Better Way Products, Inc.  
**Source Address:** 70891 C. R. 23, New Paris, IN 46996  
**Mailing Address:** 70891 C. R. 23, New Paris, IN 46996  
**Part 70 Permit No.:** 039-7106-00141  
**Facility:** Small parts production area (Resin Booth, P1-R2 and Gelcoat Booth, P1-G3)  
**Parameter:** Hazardous Air Pollutants  
**Limit:** Less than 10 tons of single HAP per 12 consecutive month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 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.**

**Conclusion**

The operation of this fiberglass manufacturing operation shall be subject to the conditions of the attached **Minor Source Modification No. 039-21091-00141** and **Minor Permit Modification No. 039-21115-00141**.

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Open Molding Operations\***  
**Resin and Gel Usage**

**Company Name:** Better Way Partners LLC, dba Better Way Products  
**Address, City, IN, Zip:** 70891 C.R. 23, New Paris, IN 46553  
**Permit Number:** 039-21091-00141  
**Reviewer:** Aida De Guzman  
**Date Application Received:** "April 5, 2005

Emission Unit ID	Material (Resin or Gel Name)	Maximum Annual Usage (lbs)	Weight % Monomer	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM
<b>Resin Booth (EU ID #P1-R2)</b>	COR61-AA257 (Neat Resin)	665000.0	29.00%	62.1	56.57	<b>10.32</b>	75%	<b>59</b>
	Blue Sprayable Resin	18000.0	36.00%	80	1.97	<b>0.36</b>	75%	<b>1.</b>
<b>Gelcoat Booth (EU IS #P1-G3)</b>	Catalina White Gelcoat	43000.0	34.50%	325.2	19.16	<b>3.50</b>	75%	<b>3.</b>
	Terra Transit White Gelcoat	4800.0	34.50%	325.2	2.14	0.39	75%	0.
	Jayco White Gelcoat	25000.0	34.50%	325.2	11.14	2.03	75%	2.
	Terra Gray Sanding Gelcoat	18100.0	35.30%	341.7	8.47	1.55	75%	1.

Note: Resin (mechanical non-atomized (styrene <33) EF = 0.107 \* 29% \* 2000 = 62.1  
 Gelcoat Ef (using the worse equation for styrene>50 = ((1.03646\*%styrene) - 0.195) \* 2000 = 325.2

Dry Filters have a 90% control eff.

<b>Uncontrolled PTE</b>	<b>14.18</b>	<b>63</b>
<b>Controlled PTE</b>		

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet fglassap42.wb3.

**METHODOLOGY**

Assume all of the monomer is styrene.

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catal solvents used is emitted).

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1998) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table. An interpolation calculator is provided on the next page for those styrene contents between the values given in the table that are not integers. Use the extrapolation equations given in the table for styrene contents less than or greater than the range of factors given in the table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) \* Gal. of material (gal material/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Usage (lb/yr) \* Ef \*365 days/year \* (1 ton/2000 lb)

Potential PM (ton/year) = Usage (lbs/yr) \* (1 - Weight % monomer or VOC) \* (1 - transfer efficiency) \* (1 ton/2000 lb)