



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: November 15, 2005
RE: Therma Tru Corporation / 003-21597-00019
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
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Indianapolis, Indiana 46204
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Chris Cron
Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721

November 15, 2005

Re: 033-21597-00019
Fourth Significant Permit Modification to
Part 70 No.: T 033-7927-00019

Dear Mr. Cron:

Therma Tru Corporation was issued a Part 70 Operating Permit T 033-7927-00019 on November 12, 1998 for a metal and fiberglass entry door manufacturing source. A letter requesting changes to this permit was received on July 25, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes to the fiberglass operations, the addition of some existing unpermitted SMC presses, and the clarification that each SMC press is considered an emission unit for the purposes of 326 IAC 8-1-6 applicability. The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395 ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

EAL/MES

Attachments

cc: File - DeKalb County
U.S. EPA - Region V
DeKalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner





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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721**

(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.

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 and 326 IAC 2-1-3.2 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.: T033-7927-00019	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: November 12, 1998 Expiration Date: November 12, 2003

First Significant Source Modification, SSM 033-10998-00019	Issuance Date: January 21, 2000
First Significant Permit Modification, SPM 033-11605-00019	Issuance Date: January 28, 2000
Second Significant Permit Modification SPM 033-11940-00019	Issuance Date: June 2, 2000
Second Significant Source Modification SSM 033-12630-00019	Issuance Date: December 5, 2000
First Administrative Amendment AAT 033-12746-00019	Issuance Date: December 8, 2000
First Minor Source Modification MSM 033-14449-00019	Issuance Date: July 30, 2001
First Reopening 033-13182-00019	Issuance Date: December 31, 2001
Second Administrative Amendment AAT 033-16180-00019	Issuance Date: November 14, 2002
Third Significant Source Modification SSM 033-20516-00019	Issuance Date: April 23, 2005
Third Significant Permit Modification SPM 033-20777-00019	Issuance Date: May 2, 2005
Fourth Significant Source Modification SSM 033-21698-00019	Issuance Date: Pending

Fourth Significant Permit Modification No. 033-21597-00019	Pages Affected: 6-8, 31-35, 38, 40, 45-53, 58
Issued by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: November 15, 2005

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant.

Responsible Official: General Manager
Source Address: 108 Mutzfeld Road, Butler, IN 46721
Mailing Address: 108 Mutzfeld Road, Butler, IN 46721
SIC Code: 3442 and 3089
County Location: DeKalb
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (2) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.
- (3) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (4) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.
- (5) Degreasing operations, identified as EU6, consisting of two (2) cold cleaner degreasers not using halogenated solvents, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

- (6) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (7) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

- (8) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (9) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (10) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (11) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (12) One (1) existing permitted calcium carbonate silo, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (13) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (14) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (15) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (16) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2.

Door Assembly Line (additional equipment)

- (17) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

SMC Presses

- (18) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (19) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (20) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (21) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.

- (22) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (23) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (24) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (25) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (26) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (27) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (28) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (29) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 - 25, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking.
- (8) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

- (9) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (10) One foam press with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (11) Two five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day.
- (12) Two five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.

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

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

- (a) it is a major source, as defined in 326 IAC 2-7-1(22); and
- (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).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 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, T 069-7927-000043 is issued for a fixed term of five (5) years from the original date, 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.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal. 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.11 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 certification 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 Data Section, 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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) 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.12 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]**

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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:

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within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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. [326 IAC 2-5-3]
 - (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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:

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Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

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

- (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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).
- (b) 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 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 increases and decreases in emissions in 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6] [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 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit criteria pollutants is less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 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.5 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.

C.6 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.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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 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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) 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 that the inspector be accredited is federally enforceable.

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

C.10 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 methods 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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule 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 ninety (90) 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).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be

subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.20 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 purposes of Part 70 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.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative, 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 (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

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)]

- (1) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (2) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.

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

Any change or modification which may increase the potential emissions of VOC to 25 tons or more per year from the door skin gluing operations (EU2) must be approved by the Office of Air Quality before such change may occur.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The flowcoater (EU3) shall use less than 74.8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 74.8 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the flowcoating operation (EU3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 PM and PM₁₀ [326 IAC 2-2]

The PM and PM₁₀ emissions from the flowcoater (EU3) shall not exceed 1.19 pounds per hour. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the door skin gluing operation (EU2) shall be limited by the following:

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

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

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 the flowcoating operation and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

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.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

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

D.1.9 Particulate Matter (PM)

The filters for PM control shall be in operation at all times when the flowcoater (EU3) is in operation.

D.1.10 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 (3.1 and 3.2) while the flowcoater is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [D_c * O * Q / [1 - W * D_c / D_w]]}{\sum C}$$

D_c = density of coating, lb/gal

O = weight percent organics, %

W = percent volume water, %

D_w = density of water, lb/gal

Q = quantity of coating, gal/unit

C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (3) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (4) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the machining operation (EU4) shall not exceed 18.58 pounds per hour when operating at a process weight rate of 19080 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silo operation (EU5) shall not exceed 2.0 pounds per hour when operating at a process weight rate of 688 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 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 the machining operation (EU4) and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the machining operation (EU4) and calcium carbonate silo (EU5) are in operation and exhausting to the outside atmosphere.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the machining operation (EU4) stack exhaust shall be performed during normal daylight operations. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the machining operation, at least once weekly when the machining process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the machining operation stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (5) Degreasing operations, identified as EU6, consisting of two (2) cold cleaner degreasers not using halogenated solvents, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

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

D.3.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.2 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

[This condition has been removed from the permit.]

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

[This condition has been removed from the permit.]

Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Reporting Requirements

There are no specific reporting requirements for this facility.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour, consisting of:

- (6) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (7) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (8) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (9) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (10) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (11) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.
- (17) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

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

Any change or modification which may increase the potential emissions of VOC to twenty-five (25) tons per year from the door assembly line adhesive application station must be approved by the Office of Air Quality before such change may occur.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the door assembly line adhesive application station shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the belt sander known as EU-7 shall not exceed 1.37 pounds per hour when operating at a process weight rate of 0.2 tons per hour.

- (d) The pounds per hour limitations were calculated with the following equation:

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

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

D.4.4 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 the door assembly line adhesive application station and the door machining station and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.4.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

- (a) Within 180 days after start-up of the door machining station, known as D2-MS1, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (b) The Permittee is not required to test the adhesive application station by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the adhesive application station is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.3(a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Conditions D.4.2 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.

D.4.7 Particulate Matter (PM)

The baghouse and cyclone in series for PM control shall be in operation and control emissions at all times that any process it controls is in operation.

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

D.4.8 Monitoring

- (a) Monthly inspections shall be performed of the adhesive application station coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 Visible Emissions Notations

- (a) Visible emission notations of the stack 20.1 exhaust shall be performed once per shift 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the door machining station, at least once daily when the machining station is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the door machining station operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.13 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the door machining operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.4.15 Record Keeping Requirements

- (a) To document compliance with Condition D.4.8, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.4.9, the Permittee shall maintain records of daily visible emission notations of the door machining station stack exhaust.
- (c) To document compliance with Condition D.4.10, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Conditions D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.11 and D.4.13 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (12) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (13) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (14) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (15) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (16) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2.

(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.5.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.2 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sheet molding compound production line shall not exceed 18.2 pounds per hour when operating at a process weight rate of 9.25 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silos, known as SILO2 and SILO3, shall not exceed 11.1 pounds per hour each when operating at a process weight rate of 4.44 tons per hour each.

The pounds per hour limitation was calculated with the following equation:

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

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

D.5.3 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 the sheet molding compound production line, including the hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2).

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.5 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

[This condition has been removed from the permit.]

D.5.6 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the two (2) calcium carbonate silos, known as SILO2 and SILO3, are in operation and exhausting to the outside atmosphere.

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

D.5.7 Visible Emissions Notations

- (a) Visible emission notations of the SILO2 and SILO3 stack 25.2 and 25.3 exhausts shall be performed once per shift 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with SILO2 and SILO3, at least once daily when SILO2 and/or SILO3 are in operation when

venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the SILO2 and SILO3 operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.5.11 Record Keeping Requirements

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of daily visible emission notations of the SILO2 and SILO3 stack exhausts.
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

- (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

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

- (18) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (19) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (20) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (21) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.
- (22) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (23) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (24) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (25) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (26) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (27) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (28) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (29) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 - 25, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour.

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

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

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render requirements of 326 IAC 2-2 not applicable:

- (a) The amount of VOC delivered to Presses 17 through 20 shall be limited to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 17 through 20 (lbs) = Total SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

- (b) The amount of VOC delivered to Presses 21 - 25 shall not exceed a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 21 - 25 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 21 - 25 (lbs/yr) = Total SMC throughput at Presses 21 - 25 (lbs/yr) x the % VOC (Styrene) content of the SMC

- (c) The VOC emissions from Presses 17 through 25 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

D.6.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.

D.6.3 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW] [326 IAC 20]

(a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:

- (1) Open molding;
- (2) Closed molding;
- (3) Centrifugal casting;
- (4) Continuous lamination;
- (5) Polymer casting;
- (6) Pultrusion;
- (7) Sheet molding compound (SMC) manufacturing; and
- (8) Bulk molding compound (BMC) manufacturing.

Also included in the affected source are all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings,

thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

- (c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5935, and are applicable to the affected source.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

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

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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

D.6.4 Record Keeping Requirement

To document compliance with Conditions D.6.1(a) and (b), the Permittee shall keep records of:

- (a) The total SMC throughput at Presses 17 through 20 and 21 through 25 each month; and
- (b) The VOC content of each SMC material used at Presses 17 through 20 and 21 through 25.

D.6.5 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) was submitted on May 9, 2002.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

- (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.6.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 21, 2005.
- (c) The significant permit modification application shall be submitted to:

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

D.6.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1(a) and (b) 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).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T033-7927-00019

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)
- 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:

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: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-7927-00019

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)
X 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
X 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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: Therma Tru Corporation
 Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Part 70 Permit No.: T 033-7927-00019
 Facilities: Presses 21 through 25
 Parameter: Amount of VOC Delivered
 Limit: Not to exceed a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC delivered shall be determined using the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 21 - 25 (lbs/yr)} = \text{Total SMC throughput at Presses 21 - 25 (lbs/yr)} \times \text{the \% VOC (Styrene) content of the SMC}$$

YEAR: _____

Month	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
 Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
 Part 70 Permit No.: T 033-7927-00019
 Facilities: Presses 17 through 20
 Parameter: Amount of VOC Delivered
 Limit: Less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC delivered shall be determined using the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 17 through 20 (lbs) = Total SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

YEAR: _____

Month	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T033-7927-00019
Facility: Flowcoater (EU3)
Parameter: VOC delivered to the flowcoater
Limit: Less than 74.8 tons per twelve (12) consecutive month period

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T033-7927-00019

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed by: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Therma Tru Corporation
Source Location:	108 Mutzfeld Road, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3442 and 3089
Operation Permit No.:	T 033-7927-00019
Operation Permit Issuance Date:	November 12, 1998
Significant Source Modification No.:	033-21698-00019
Significant Permit Modification No.:	033-21597-00019
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a modification application from Therma Tru Corporation relating to the operation of the following existing unpermitted emission units and pollution control devices:

- (a) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (b) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (c) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.
- (d) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (e) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (f) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (g) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (h) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (i) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.

History

Therma Tru Corporation was issued a Part 70 Operating Permit on November 12, 1999. On July 25, 2005, Therma Tru Corporation submitted an application to the OAQ requesting to revise their Part 70 permit, specifically those sections concerning their fiberglass door manufacturing operations. The applicant has requested to include the above mentioned unpermitted SMC presses in the operating permit. All SMC presses have been relocated to Section D.6.

The existing permitted sheet molding compound (SMC) presses are currently listed in the permit under one of two fiberglass production lines (EU1 or SMC2). This gives the false impression that the fiberglass door production operations are made up of two (2) separate and distinct emission units, each which include SMC mixing, extruding, and molding operations (presses). In fact, Therma Tru has removed some previously permitted SMC manufacturing equipment, and now has only one SMC machine (which includes mixing, extruding, etc.). The SMC from this process is then sent to any one of the 24 SMC presses, in order to make one of the different styles of fiberglass doors that Therma Tru manufactures. It is more accurate to denote the SMC manufacturing as a single process, and to consider each SMC press as an independent operation. Thus, each SMC press would be limited to less than twenty-five (25) tons per year of VOC emissions in order to ensure that 326 IAC 8-1-6 does not apply. Appendix A shows that the potential to emit of each SMC press is less than twenty-five (25) tons per year.

Since this source became a major source under 326 IAC 2-2 (PSD) after issuance of the January 2000 source and permit modifications, the four (4) SMC presses installed in 2002 (Presses 17 through 20) shall be limited to less than a total of 40 tons per year of VOC, in order to ensure that the modification was a minor modification under 326 IAC 2-2. The two (2) SMC presses installed in 2001 have potential VOC emissions less than a total of 40 tons per year, therefore, a limit on these presses (Presses 15 and 16) is unnecessary.

Enforcement Issue

- (a) IDEM, OAQ is aware that Therma Tru has exceeded some permit limitations. IDEM is reviewing this matter and will take appropriate action.
- (b) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document as SMC presses 7 through 9 and 15 through 20. IDEM is reviewing this matter and will take appropriate action. This proposed permit modification is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 25, 2005. Additional information was received on August 1, 2005.

Emission Calculations

Page 1 of 1 of Appendix A of this document contains detailed emissions calculations showing the

unrestricted potential to emit for each of the 24 SMC presses at this source. Note that the total potential to emit from the SMC presses is restricted by the capacity of the SMC machine, which is 18,500 pounds of SMC per hour. However, this does not restrict the potential to emit from any individual press.

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	148
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Styrene	148
TOTAL HAPs	148

Justification for Modification

The Part 70 source is being modified through a Part 70 Significant Source Modification, pursuant to 326 IAC 2-7-10.5(f)(4), because the potential VOC emissions are greater than twenty-five (25) tons per year. The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 2-7-12(d)(1).

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment

Pollutant	Status
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) DeKalb County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) DeKalb County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Greater Than 250
PM ₁₀	Greater Than 250
SO ₂	Less Than 250
VOC	Greater Than 250
CO	Less Than 250
NO _x	Less Than 250

- (a) This existing source is a major stationary source because PM, PM₁₀ and VOC are each emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the information contained within the TSDs for SSM 033-

10998-00019, issued January 21, 2000, and SSM 033-20516-00019 issued April 23, 2005.

Potential to Emit of 1989 Modification

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Modification (SMC Presses 1 through 8)	-	-	-	134.5	-	-
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source was not major because the emission increase was less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Potential to Emit of 1999 Modification

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Modification (SMC Press 9)	-	-	-	13.60	-	-
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source was not major because the emissions increase was less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This source became a major source under PSD in 2000, after construction of the Door Assembly Line and the New Skins Warehouse increased the potential PM and PM₁₀ emissions to greater than two hundred fifty (250) tons per year.

Potential to Emit of 2001 Modification

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Modification (SMC Presses 15 and 16)	-	-	-	33.65	-	-
Net Emissions	-	-	-	33.65	-	-
PSD Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source was not major because the emissions increase was less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Potential to Emit of 2002 Modification

Pollutant	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_x (tons/yr)
Modification (SMC Presses 17 through 20)	-	-	-	Less than 40.0	-	-
Net Emissions	-	-	-	Less than 40.0	-	-
PSD Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the emissions increase is limited to less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) In order to render the requirements of 326 IAC 2-2 not applicable, this source has elected to limit:
 - (1) The amount of VOC delivered to Presses 17 through 20 to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:

$$\text{Amount of VOC delivered to Presses 17 through 20 (lbs)} = \text{Total SMC throughput at Presses 17 through 20 (lbs)} \times \text{the \% VOC (Styrene) content of the SMC}$$

and

- (2) The VOC emissions from Presses 17 through 20 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

Note that the emission factor limit in paragraph (b)(2) is based on the AP-42 emission factor for closed molding processes.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC;
 - (2) that is subject to an emission limitation or standard for VOC; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) This source is a major source of hazardous air pollutant (HAP) emissions (i.e., the source has the potential to emit ten (10) tons per year or greater of a single HAP or twenty-five (25) tons per year or greater of a combination of HAPs) and uses greater than a combined total of 1.20 tons per year of thermacet resins or gel coats that contain styrene. The unpermitted SMC Presses, identified as Presses 7 through 9 and 15 through 20 will be considered part of the existing affected source since the source was operating fiberglass presses prior to August 2, 2001.

This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (326 IAC 14, 326 IAC 20-1-1, and 40 CFR 63, Subpart WWWW). A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance in the pending Title V permit renewal. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) was submitted to IDEM, OAQ on May 9, 2002.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (PSD)

This source became a major source under 326 IAC 2-2 in 2000, after construction of the Door Assembly Line and the New Skins Warehouse increased the potential PM and PM₁₀ emissions to greater than two hundred fifty (250) tons per year. Therefore, the four (4) SMC presses installed in 2002 (Presses 17 through 20) shall be limited to less than a total of 40 tons per year of VOC, in order to ensure that the modification was a minor modification under 326 IAC 2-2. The two (2) SMC presses installed in 2001 have potential VOC emissions less than a total of 40 tons per year, therefore, a limit on these presses (Presses 15 and 16) is unnecessary.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1(b)(2), a major source specifically regulated, or exempted from regulation, by a standard issued pursuant to Sections 112(d), 112(h), or 112(j) of the CAA is not subject to the requirements of 326 IAC 2-4.1 (formerly 326 IAC 2-1-3.4). Since the SMC presses are subject to the requirements of 40 CFR 63, Subpart WWWW (which is a Section 112(j) MACT), as part of the existing source, the requirements of 326 IAC 2-4.1 do not apply to the SMC presses.

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

The unrestricted potential to emit VOC from each of the SMC presses is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these presses.

Compliance Requirements

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

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

There are no specific compliance monitoring requirements applicable this modification.

Testing Requirements

Since an SMC throughput limit in combination with an AP-42 emission factor is being used to limit VOC emissions and there is no VOC control device, there will be no testing requirements included in this modification.

Proposed Changes

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

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant.

Responsible Official: General Manager
Source Address: 108 Mutzfeld Road, Butler, IN 46721
Mailing Address: 108 Mutzfeld Road, Butler, IN 46721
SIC Code: 3442 and 3089
County Location: DeKalb
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) ~~Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4~~
- (1 2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (2 3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.
- (3 4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (4 5) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.
- (5 6) Degreasing operations, identified as EU6, consisting of two (2) cold cleaner degreasers not using halogenated solvents, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

- (6 7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (7 8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (8 9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (9 10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (10 4) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (11 2) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (12 3) One (1) existing permitted calcium carbonate silo ~~to be relocated~~, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (13 4) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (14 5) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (15 6) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- ~~(17) Four (4) sheet molding compound presses, total throughput 18,500 pounds of sheet molding compound per hour.~~
- (16 8) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2.

Door Assembly Line (additional equipment)

- (17 9) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

SMC Presses 21–25

- (18) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (19) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (20) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (21) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.
- (22) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (23) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (24) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (25) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (26) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (27) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (28) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (2920) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 - 25, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (1) ~~Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4~~
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (2 3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum

capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.

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

- ~~(a) The total potential to emit VOCs from the fiberglass operation (EU1) shall be limited to 24 tons per year, based on a monthly rolling average. Therefore, pursuant to 326 IAC 8-1-6 (BACT), this facility will not be subject to this rule.~~
- ~~(b) Any change or modification which may increase the actual emissions of VOC to 25 tons or more per year from the fiberglass operations (EU1) must be approved by the Office of Air Quality before such change may occur.~~
- ~~(c) Any change or modification which may increase the potential emissions of VOC to 25 tons or more per year from the door skin gluing operations (EU2) must be approved by the Office of Air Quality before such change may occur.~~

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

- ~~(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass operation shall not exceed 17.38 pounds per hour when operating at a process weight rate of 17280 pounds per hour.~~

~~The pounds per hour limitation was calculated with the following equation:~~

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

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

- ~~(b) Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the door skin gluing operation (EU2) shall be limited by the following:~~

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

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

D.1.8 VOC Emissions

~~Compliance with Conditions D.1.1(a) and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.~~

D.1.12 Reporting Requirements

~~A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2 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.~~

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (3 4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (4 5) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (5 6) Degreasing operations, identified as EU6, consisting of two (2) cold cleaner degreasers not using halogenated solvents, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour, consisting of:

- (6 7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (7 8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (8 9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (9 10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (10 4) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (11 2) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.
- (17 9) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (12 3) One (1) existing permitted calcium carbonate silo ~~to be relocated~~, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (13 4) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (14 5) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (15 6) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- ~~(17) Four (4) sheet molding compound presses, total throughput 18,500 pounds of sheet molding compound per hour.~~
- (16 8) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2.

(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.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

~~The total potential to emit VOCs from the sheet molding compound production line shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period. The total potential to emit VOCs shall be calculated by multiplying the total mass of volatile organic compounds (VOC) in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any VOCs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit VOCs from the sheet molding compound production line. Therefore, this VOC emission limit will render 326 IAC 8-1-6 not applicable to the sheet molding compound production line.~~

~~D.5.2 HAPs [326 IAC 2-1-3.4]~~

~~The total potential to emit a single and combination of HAPs from the sheet molding compound production line shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. The total potential to emit HAPs shall be calculated by multiplying the total mass of HAPs in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the sheet molding compound production line. Therefore, these HAPs limits will render 326 IAC 2-1-3.4 not applicable to the sheet molding~~

~~compound production line.~~

D.5.13 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.24 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sheet molding compound production line shall not exceed 18.2 pounds per hour when operating at a process weight rate of 9.25 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silos, known as SILO2 and SILO3, shall not exceed 11.1 pounds per hour each when operating at a process weight rate of 4.44 tons per hour each.

The pounds per hour limitation was calculated with the following equation:

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

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

D.5.35 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 the sheet molding compound production line, including the hose cleaning recirculation station, (cold cleaner tank, known as SMC-CC2).

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.46 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.24 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.57 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

[This condition has been removed from the permit.]

D.5.68 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the two (2) calcium carbonate silos, known as SILO2 and SILO3, are in operation and exhausting to the outside atmosphere.

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

D.5.79 Visible Emissions Notations

- (a) Visible emission notations of the SILO2 and SILO3 stack 25.2 and 25.3 exhausts shall be performed once per shift 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.840 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with SILO2 and SILO3, at least once daily when SILO2 and/or SILO3 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.944 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the SILO2 and SILO3 operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.102 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue

only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.5.113 Record Keeping Requirements

-
- ~~(a)~~ To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.2.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC and HAPs usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (a b) To document compliance with Condition D.5.79, the Permittee shall maintain records of daily visible emission notations of the SILO2 and SILO3 stack exhausts.
- (b e) To document compliance with Condition D.5.840, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
- (A) Inlet and outlet differential static pressure; and
- (B) Cleaning cycle: frequency and differential pressure
- (2) Documentation of all response steps implemented, per event .
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c d) To document compliance with Condition D.5.944, the Permittee shall maintain records of the results of the inspections required under Condition D.5.944 and the dates the vents are

redirected.

- (d e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.14 Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 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.~~

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **SMC Presses 21–25**

- (18) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (19) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (20) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (21) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.
- (22) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (23) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (24) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (25) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (26) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (27) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (28) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (2920) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 - 25, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour.

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

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

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render requirements of 326 IAC 2-2 not applicable:

- (a) The amount of VOC delivered to Presses 17 through 20 shall be limited to less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 17 through 20 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 17 through 20 (lbs) = Total SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

- (b a) The amount of VOC delivered to Presses 21 - 25 shall not exceed a total of 2,512,320 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC delivered to Presses 21 - 25 shall be determined by the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 21 - 25 (lbs/yr) = Total SMC throughput at Presses 21 - 25 (lbs/yr) x the % VOC (Styrene) content of the SMC

- (c b) The VOC emissions from Presses **17 through 24**– 25 shall not exceed 0.030 pounds of VOC emitted per pound of VOC contained in the SMC.

D.6.4 Record Keeping Requirement

- ~~(a)~~ To document compliance with Conditions D.6.1(a) **and (b)**, the Permittee shall keep records of:

(a 4) The total SMC throughput at Presses **17 through 20 and 21** through 25 each month; and

(b 2) The VOC content of each SMC material used at Presses **17 through 20 and 21** through 25.

- ~~(b)~~ ~~To document compliance with Condition D.6.1(c), the Permittee shall keep records of increase in actual monthly VOC emissions from the SMC machine that is upstream from Presses 21 – 25.~~

D.6.5 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) was submitted on May 9, 2002.

(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.

(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.

(4) If complying by using an add-on control device, the Permittee shall submit:

- (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.6.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 21, 2005.
- (c) The significant permit modification application shall be submitted to:

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

D.6.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1(a) and (b) 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).

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

Part 70 Quarterly Report

Source Name: _____ Therma Tru Corporation
 Source Address: _____ 108 Mutzfeld Road, Butler, Indiana 46724
 Mailing Address: _____ 108 Mutzfeld Road, Butler, Indiana 46724
 Part 70 Permit No.: _____ T033-7927-00019
 Facility: _____ Fiberglass Operations (EU1)
 Parameter: _____ VOC
 Limit: _____ 24 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions this Month	VOC Emission 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: _____

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

Part 70 Quarterly Report

Source Name: _____ Therma Tru Corporation
 Source Address: _____ 108 Mutzföld Road, Butler, Indiana 46724
 Mailing Address: _____ 108 Mutzföld Road, Butler, Indiana 46724
 Source Mod. No.: _____ SSM 033-10998-00019
 Facility: _____ Sheet Molding Compound Line
 Parameter: _____ VOC
 Limit: _____ Single HAP and Combination of HAPs Less than ten (10) and twenty five tons per
 twelve (12) consecutive month period, respectively

YEAR: _____

Month	This Month (tons)		Previous 11 Months (tons)		12 Month Total (tons)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-7927-00019
Facilities: Presses 17 through 20
Parameter: Amount of VOC Delivered
Limit: Less than a total of 2,666,667 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC delivered shall be determined using the following equation for each type of SMC material used:

Amount of VOC delivered to Presses 17 through 20 (lbs) = Total SMC throughput at Presses 17 through 20 (lbs) x the % VOC (Styrene) content of the SMC

YEAR: _____

Month	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)	Amount of VOC Delivered (pounds)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.
 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-21698-00019 and Significant Permit Modification No. 033-21597-00019.

**Appendix A: Emissions Calculations
From Fiberglass Press Operations**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfeld Road
Permit Number: SPM 033-21597
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Application Date: July 25, 2005

Press ID	Installation Date	SMC Capacity (lbs/hr)	Max VOC Content (Styrene) (%)	Emission Factor (%)	VOC and Styrene Potential (lbs/hr)	VOC and Styrene Potential (tons/yr)
1	1989	1,067	12.0%	3.0%	3.84	16.82
2	1989	1,067	12.0%	3.0%	3.84	16.82
3	1989	1,067	12.0%	3.0%	3.84	16.82
4	1989	1,067	12.0%	3.0%	3.84	16.82
5	1989	1,067	12.0%	3.0%	3.84	16.82
6	1989	1,067	12.0%	3.0%	3.84	16.82
7*	1989	1,067	12.0%	3.0%	3.84	16.82
8*	1989	1,067	12.0%	3.0%	3.84	16.82
9*	1999	862.5	12.0%	3.0%	3.11	13.60
11	2000	1,067	12.0%	3.0%	3.84	16.82
12	2000	1,067	12.0%	3.0%	3.84	16.82
13	2000	1,067	12.0%	3.0%	3.84	16.82
14	2000	1,067	12.0%	3.0%	3.84	16.82
15*	2001	1,067	12.0%	3.0%	3.84	16.82
16*	2001	1,067	12.0%	3.0%	3.84	16.82
17*	2002	1,067	12.0%	3.0%	3.84	16.82
18*	2002	1,067	12.0%	3.0%	3.84	16.82
19*	2002	1,067	12.0%	3.0%	3.84	16.82
20*	2002	1,067	12.0%	3.0%	3.84	16.82
17-20 Limit					Less than	40.00
21	2005	1,067	12.0%	3.0%	3.84	16.82
22	2005	1,067	12.0%	3.0%	3.84	16.82
23	2005	1,067	12.0%	3.0%	3.84	16.82
24	2005	1,067	12.0%	3.0%	3.84	16.82
25	2005	1,067	12.0%	3.0%	3.84	16.82
21-25 Limit						37.68
Total		18,500	12.0%	3.0%	66.60	291.71

METHODOLOGY

* Unpermitted units

Emission factor taken from AP-42 Ch 4.4 for closed molding operations

Potential Emissions (lbs/hour) = SMC Capacity (lbs/hour) * VOC (Styrene) Content (%) * Emission Factor (%)

Potential Emissions (tons/year) = Potential Emissions (lbs/hour) * 8,760 hours/year / 2000 lbs/ton

All VOC is Styrene

Total SMC emissions are restricted by the production capacity of the SMC machine, which is 18,500 lbs/hr