



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: February 8, 2006
RE: Topp Industries, Inc. / 049-21798-00018
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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(800) 451-6027
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Mr. Dale Graham
Topp Industries, Inc.
P. O. Box 420, Hwy 25 North
Rochester, Indiana 46975

February 8, 2006

Re: 049-21798-00018
Second Significant Permit Modification to
Part 70 Permit No.: 049-9015-00018

Dear Mr. Graham:

Topp Industries, Inc. was issued a Part 70 permit on May 31, 2001, for the operation of fiberglass reinforced plastics tank and related sewer parts manufacturing operation. An application to modify the source was received by the Office of Air Quality (OAQ) on November 8, 2004. 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 is as follows:

Construction of one (1) non-atomized fluid impingement unit, coating a maximum of 60.18 plastic tank mold units per hour.

The modification also incorporates the requirements of the federal regulation 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Seema Roy, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or at 973-575-2555, extension 3217, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by
Paul Dubenetzky
Acting Assistant Commissioner
Office of Air Quality

Attachments
SR / EVP

cc: File - Fulton County
Fulton County Health Department
Air Compliance Section Inspector – Rick Reynolds
Compliance Data Section
Administrative and Development
Technical Support and Modeling





Mitchell E. Daniels, Jr.
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Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

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

**Topp Industries, Inc.
Highway 25 North
Rochester, Indiana 46975**

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

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

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

Operation Permit No.: T049-9015-00018	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 31, 2001 Expiration Date: May 31, 2006

First administrative amendment no. 049-14806-00018 issued on September 19, 2001;
Second administrative amendment no. 049-17294-00018 issued on September 18, 2003;
First Significant Permit Modification no. 049-19887-00018 issued on March 21, 2005; and
Third administrative amendment no. 049-20776-00018 issued on April 15, 2005.

Second Significant Permit Modification No.:049-21798-00018	Pages Affected: Pages Affected: 2, 3, 4, 5, 17, 18, 23, 24, 26 to 32dd and 33
Issued by: Original signed by Paul Dubenetzky Acting Assistant Commissioner Office of Air Quality	Issuance Date: February 8, 2006 Expiration Date: May 31, 2006

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fiberglass reinforced plastics tank and related sewer parts manufacturing operation.

Responsible Official:	Kevin Birchmeier
Source Address:	Highway 25 North, Rochester, Indiana 46975
Mailing Address:	P.O. Box 420, Rochester, Indiana 46975
SIC Code:	3089
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor 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:

one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:

- (a) one cutting and grinding booth, constructed in 1992, trimming a maximum of 5.4 FRP tanks per hour, equipped with dry filters for particulate control, and exhausting through one (1) stack (ID No. V1).
- (b) one (1) resin application area consisting of seven (7) non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 421.3 plastic tank mold units per hour. The spray application units are located in:
 - (1) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (2) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).

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):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. This is a small grinder located in the same booth as the larger cutting and grinding operation with a maximum throughput of 5.4 FRP tanks per hour. [326 IAC 6-3]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

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

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

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

This permit 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.3 Enforceability [326 IAC 2-7-7]

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

B.4 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.5 Severability [326 IAC 2-7-5(5)]

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

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

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

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

- (a) The Permittee, 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:

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

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

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

Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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, except those specifically designated as not federally enforceable, 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) To the extent specifically designated by this permit or required by an applicable requirement, compliance reports (including testing, monitoring, reporting, and record keeping requirements set forth in Sections D) prepared by the Permittee and submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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 appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 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 (PMPs) 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 control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs 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:

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventative maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 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 the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.
The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the

following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

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

Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (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, 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (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 Source Modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section Dn of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

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

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Source 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 Source Modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) 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.
 - (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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

- (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 Source 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 Source Modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted 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.

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

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill

- from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

Except as otherwise provided by statute or rule, or in this permit, 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 unit(s) vented to the control equipment are in operation.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).
- All required notifications shall be submitted to:
- Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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.8 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

in writing, prior to the end of the initial 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).

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

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

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

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

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

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

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual 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).

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

- (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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

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

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

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

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 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)]:

one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:

- (a) one cutting and grinding booth, constructed in 1992, with a large and small grinder, trimming a maximum of 5.4 FRP tanks per hour, equipped with dry filters for particulate control, and exhausting through one (1) stack (ID No. V1).
- (b) one (1) resin application area consisting of seven (7) non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 421.3 plastic tank mold units per hour. The spray application units are located in:
 - (1) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (2) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).

(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]

Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the resin application area shall be the following:

- (a) Use of resins and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin applications shall be limited to 99 tons per twelve (12) consecutive months.
 - (1) Potential VOC emissions from the use of resins and clean-up solvents, as well as VOC delivered to the applicators in the FRP tank production process are less than 99 tons per year. Any change or modification that would increase the potential VOC emissions from the FRP tank production process to greater than 99 tons per year shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.
- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. If all of the resins used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.6 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. If non-compliant resins are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

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

Where: Emissions, lb or ton = M (mass of resin, lb or ton) * EF (Monomer emission factor for resin %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each resin used.

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, impingement guns, pressure-feed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for filled resins (where fillers are required for corrosion or fire retardant purposes) at alltimes. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that

evaporation is minimized.

- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 HAP Emission Standards [326 IAC 20-25-3]

On and before April 21, 2006, pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule, including:

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

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as specified in following condition D.1.52 (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.11 is sufficient for demonstrating compliance with the HAP monomer content limits.

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

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

For averaging within a category:

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

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

Units: mass = tons

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

emissions = lbs of monomer

Note: Fillers may not be included when averaging

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

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

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

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

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

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

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

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to paragraphs (2) through (4) above.

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

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

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

The particulate matter (PM) from the cutting and grinding booth with a large and small grinder shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on 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.1.4 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 these facilities and their control devices.

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

On and before April 21, 2006, pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.

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

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

On and before April 21, 2006, pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

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

Compliance Determination Requirements

D.1.7 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]

On and before April 21, 2006, compliance with the HAP monomer content limitations in condition D.1.2 shall be determined by one of the following:

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

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

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in Condition D.1.10.

D.1.9 Volatile Organic Compounds (VOC)

- (a) Use of resins and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, and summing the emissions for all resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. If all of the resins used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

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

$(\text{Emissions from } >35\% \text{ resin}) - (\text{Emissions from } 35\% \text{ resin}) \leq (\text{Emissions from } 35\% \text{ resin}) - (\text{Emissions from } <35\% \text{ resin, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin used, lb or ton) * EF (Monomer emission factor for resin used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each resin used.

D.1.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the cutting and grinding booth with a large and small grinder at all times that the cutting and grinding booth is in operation.

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

D.1.11 Record Keeping Requirements [326 IAC 20-25-6(b)][326 IAC 20-25-8]

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1.
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each resin used in the resin application area. The amount and VOC content of each solvent used shall also be recorded. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The monomer content of resins shall be calculated on a neat basis, i.e., excluding any filler, for each month in which noncompliant resins are used; and

- (3) The weight of VOCs emitted for each compliance period.
- (A) VOC emissions from the resin application area shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, and summing the emissions for all resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins that is not styrene shall be considered as styrene on an equivalent weight basis.
- (C) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.16. Monthly purchase orders, invoices and material safety data sheets (MSDS) shall be sufficient to allow calculation of monthly VOC emissions from the FRP process.
- (b) On and before April 21, 2006, to document compliance with Condition D.1.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Examples of such records include but are not limited to:
- (1) The usage by weight and monomer content of each resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin;
- (2) Method of application and other emission reduction techniques for each resin;
- (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins are used during that month.
- (4) Records of all information, including all reports and notifications required by 326 IAC 20-25.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements [326 IAC 20-25-7]

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 within thirty (30) days after the end of the quarter being reported.

D.1.13 General Provisions Relating to NESHAP Subpart WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

D.1.14 NESHAP Subpart WWWW Requirements [40 CFR Part 63, Subpart WWWW]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780 by April 21, 2006, as specified below:

Compliance Dates and Standards

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

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

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

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

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

Options for Meeting Standards

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

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Sec. 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

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

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

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

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i , lbs/ton;
Material $_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;

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

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

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

(c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average

organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;
Material_i=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons; n=number of operations.

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i=Actual organic HAP emissions factor for operation type i, lbs/ton;
Material_i=neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons; n=number of operations.

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

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

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

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

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

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

General Compliance Requirements

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

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

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

Testing and Initial Compliance Requirements

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

Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.

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

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

Continuous Compliance Requirements

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

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

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

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

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

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

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

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

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

(c) During periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

Notifications, Reports, and Records

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

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

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

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

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

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

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

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

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

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

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

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

(1) Company name and address.

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

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

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

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

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

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

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

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

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

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

§ 63.5915 What records must I keep?

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

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

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

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

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

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

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

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

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

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

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

Other Requirements and Information

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

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

§ 63.5930 Who implements and enforces this subpart?

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

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

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

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

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

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

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

§ 63.5935 What definitions apply to this subpart?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Corrosion-resistant resin means a resin that either:

- (1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH \geq 12.0 or \leq 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or
- (2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Prepreg materials means reinforcing fabric received pre-coated with resin which is usually cured through the addition of heat.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

As required in §§63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams you must use the equations in the following table:

If your operation type is a new or existing....	And you use . .	With . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ³⁴ . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ³⁴ . . .
1. Open molding operation	a. Manual resin application.	i. Nonvapor-suppressed resin. ii. Vapor-suppressed resin.	$EF = 0.126 \times \% \text{ HAP} \times 2000.$ $EF = 0.126 \times \% \text{ HAP} \times 2000 \times (1 - (0.5 \times \text{VSE factor}))$	$EF = ((0.286 \times \% \text{ HAP}) - 0.0529) \times 2000$ $EF = ((0.286 \times \% \text{ HAP}) - 0.0529) \times 2000 \times (1 - (0.5 \times \text{VSE factor}))$
	c. Nonatomized Mechanical resin application.	v. Nonvapor-suppressed resin.	$EF = 0.107 \times \% \text{ HAP} \times 2000.$	$EF = ((0.157 \times \% \text{ HAP}) - 0.0165) \times 2000$

Footnotes to Table 1

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.

³ The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

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

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

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

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

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

If your operation is...	And you use...	Your organic HAP emissions limit is ¹
3. Open molding-tooling	b. Manual resin application	157 lb/ton

Footnotes to Table 3

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

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

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

For . . .	You must . . .
2. A new or existing cleaning operation.	Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. A new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

Table 5 to Subpart WWWW of Part 63—Alternative Organic HAP Emissions Limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations Where the Standard are Based on a 95 Percent Reduction Requirement

As specified in §63.5805, as an alternative to the 95 percent organic HAP emissions reductions requirement, you may meet the appropriate organic HAP emissions limits in the following table:

If your operation type is . . .	And you use . . .	Your organic HAP emissions limit is a ¹ . . .
3. Open molding-tooling.....	a. Mechanical resin application.	13 lb/ton.
	b. Manual resin application.	8 lb/ton.

¹ Organic HAP emissions limits for open molding and centrifugal casting expressed as lb/ton are calculated using the equations shown in Table 1 to this subpart. You must be at or below these values based on a 12-month rolling average.

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

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

If your facility has the following resin type and application method . . .	The highest resin Weight is*** percent organic HAP content, or weighted average weight percent organic HAP content, you can use for .	Is . . .
8. Tooling resins, manual.....	Tooling manual	91.4

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

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

For . . .	That must meet the following organic HAP emissions limit..	You have demonstrated initial compliance if..
1. Open molding and centrifugal casting operations.	a. An organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.	i. You have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, or ii. You demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. You demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards

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

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
2. A new or existing cleaning operation.	Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.
3. A new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

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

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

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facility's compliance date.

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

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

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

in § 63.8(c)(7),

the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period.

b. The information in § 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the information in § 63.5910(e).

Semiannually according to the requirements in § 63.5910(b).

c. The information in § 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan.

Semiannually according to the requirements in § 63.5910(b).

2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.

a. Actions taken for the event.

By fax or telephone within 2 working days after starting actions inconsistent with the plan.

b. The information in § 63.10(d)(5)(ii).

By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§ 63.10(d)(5)(ii)).

D.1.15 NESHAP WWWW Requirements [326 IAC 20-56]

Pursuant to 326 IAC 20-56, the Permittee shall comply with the previous version of 40 CFR 63, Subpart WWWW, published in 68 FR 19402, April 21, 2003 with a compliance date of April 21, 2006. Compliance with the requirements specified in Condition D.1.14 shall satisfy the requirements of 326 IAC 20-56, with the exception of the requirements listed under 40 CFR 63.5805, 40 CFR 63.5810, CFR 63.5895(d), CFR 63.5900, CFR 63.5935 and Tables 1, 3, 4, 7, 8 and 9. In place of those requirements, to satisfy 326 IAC 20-56 only, the Permittee shall comply with the following:

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

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

(a) If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous lamination/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

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

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards in §63.5805. When you are complying with an emission limit in Tables 3 or 5 to this subpart, you may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all of your emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are currently using unless you were using the compliant materials option in paragraph (d) of this section. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Meet the individual organic HAP emissions limits for each operation.* Demonstrate that you meet the individual organic HAP emissions limits for each open molding operation and for each centrifugal casting operation type in Tables 3, or 5 to this subpart that apply to you. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method you use in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. Your calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 to this subpart based on a 12-month rolling average. Use the procedures described in paragraphs (a)(1) through (3) of this section to calculate average organic HAP emissions factors for each of your operations.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: The neat resin plus or neat gel coat plus organic HAP content, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. If you want to use vapor suppressants to meet the organic HAP emissions limit for open molding, you must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of appendix A to subpart WWWW of 40 CFR part 63.

(2) Calculate your actual operation organic HAP emissions factor for the last 12 months for each open molding operation type and for each centrifugal casting operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that correspond to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type. Use Equation 2 of this section to calculate your actual organic HAP emissions factor for each open molding operation type and each centrifugal casting operation type.

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

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i, lbs/ton
 Material $_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons

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

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

(b) *HAP Emissions factor averaging option.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Tables 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Tables 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months. Use Equation 3 of this section to calculate the weighted average organic HAP emissions limit for all open molding operations and separately for all centrifugal casting operations.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3, 5 or 7 to this subpart
 Material $_i$ =neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons

n=number of operations

(2) Each month calculate your actual weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations. You must calculate your actual individual HAP emissions factors for each operation type as described in paragraphs (a)(1) and (2) of this section. Use Equation 4 of this section to calculate your actual weighted average organic HAP emissions factor.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i , lbs/ton
 Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i , tons
 n = number of operations

(3) Compare the values calculated in paragraphs (b)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(c) If you have multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resin(s) for all operations of that resin type. If you have more than one operation type, you may meet the emission limit for one of those operations, and use the same resin(s) in all other open molding and centrifugal casting operations.

(1) This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

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

(3) You may also use a weighted average organic HAP content for each operation described in paragraph (c)(2) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in §63.5810(a)(2) except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

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

(d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to this subpart.

Continuous Compliance Requirements

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

(d) If you initially demonstrate that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then resin and gel coat use records are not required. However, you must include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits for compliant resins and gel coats shown in Tables 3 or 7 to this subpart. If after this initial demonstration, you change to a higher organic HAP resin or gel coat, or increase the resin or gel coat organic HAP content, or change to a higher emitting resin or gel coat application method, then you must either again demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or begin collecting resin and gel coat use records and calculate compliance on a 12-month rolling average.

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

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

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

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

§ 63.5935 What definitions apply to this subpart?

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

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

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

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

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

Table 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams¹

[As specified in §§63.5796, 63.5799(a)(1) and (b), and 635810(a)(1), to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams you must use the equations in the following table:]

If your operation type is a new or existing....	And you use . .	With . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ^{1 2 3} . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ^{1 2 3} . . .
1. Open molding operation	a. Manual resin application.	i. Nonvapor-suppressed resin. ii. Vapor- suppressed resin.	EF = 0.126 x % HAP x 2000. EF = 0.126 x % HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor)).
	c. Nonatomized Mechanical resin application.	i. Nonvapor-suppressed resin.	EF = 0.107 x % HAP x 2000.	EF = ((0.157 x %HAP)-0.0165) x 2000

Footnotes to Table 1

2 Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.

3 The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

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

[As required in §§63.5796, 63.5805 (a) through (c) and (g), 63.5810(a), (b), and (d), 63.5820(c), 63.5830, 63.5835(a), 63.5895(c) and (d), 63.5900(a)(2), and 63.5915(c), you must meet the appropriate organic HAP emissions limits in the following table:]

If your operation is....	And you use...	Your organic HAP emissions limit is ¹	And the highest organic HAP content for a compliant resin or gel coat is ²
3. Open molding-tooling	b. Manual resin application	157 lb/ton	45.9

Footnotes to Table 3

1 Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

2 A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.

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

[As required in §§63.5805 (a) through (d) and (g), 63.5835(a), 63.5900(a)(3), 63.5910(c)(5), and 63.5915(d), you must meet the appropriate work practice standards in the following table:]

For . . .	You must . . .
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation.	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

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

[As required in §§63.5810(a) through (d), 63.5835(a), 63.5895(c), and 63.5900(a)(2), when electing to use the same resin(s) for multiple resin application methods you may use any resin(s) with an organic HAP contents less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:]

If your facility has the following resin type and application method . . .	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	Is . . .
8. Tooling resins, manual	Tooling atomized mechanical	45.9

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

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

For . . .	That must meet the following organic HAP emissions limit. . .	You have demonstrated initial compliance if. . .
1. Open molding and centrifugal casting operations.	a. an organic HAP emissions limit shown in Tables 3 and 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.	i. You have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average ¹ year after the appropriate compliance date, or ii. You demonstrate by using the appropriate values in Tables 3, or 7 to this subpart that all resins and gel coats considered individually meet the appropriate organic HAP contents, or iii. You demonstrate by using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

Table 9 to Subpart WWWW of Part 63—Initial Compliance with Work Practice Standards

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

For . . .	That must meet the following standards. . .	You have demonstrated initial compliance if. . .
2. a new or existing cleaning operation	Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.

3. a new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing material, and that any bulk storage tanks are vented only as necessary for safety.
----------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

D.1.16 One Time Deadlines Relating to NESHAP Subpart WWWW

- (a) The Permittee shall conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
- (b) The Permittee must submit a notification of compliance status before the close of business on the 60th day following the completion of compliance demonstration.

D.1.17 Operator Training Requirements [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2:

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit
- 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: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

This form consists of 2 pages

Page 1 of 2

<p>☛ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C 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); andC The Permittee must submit notice by mail or facsimile within two (2) 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 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Permit Modification

Source Name:	Topp Industries, Inc.
Source Location:	Highway 25 North, Rochester, Indiana 46975
County:	Fulton
SIC Code:	3089
Operation Permit No.:	T049-9015-00018
Operation Permit Issuance Date:	May 31, 2001
Significant Source Modification No.:	049-21788-00018
Significant Permit Modification No.:	049-21798-00018
Permit Reviewer:	Seema Roy/EVP

On December 17, 2005, the Office of Air Quality (OAQ) had a notice published in "Rochester Sentinel" in Rochester, Indiana, stating that Topp Industries, Inc. had applied for the construction of one (1) non-atomized fluid impingement unit, coating a maximum of 60.18 plastic tank mold units per hour and also for incorporation of the requirements of the federal regulation 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production in the Part 70 Permit No T049-9015-00018, issued on May 31, 2001. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification should be issued as proposed.

There were no comments received. However, upon further review, the OAQ has decided to make the following changes to the Significant Permit Modification. Bolded language has been added and the language with a line through it has been deleted.

1. Since the Record Keeping Requirements in Condition D.1.11(b) are required only until April 21, 2006, Condition D.1.11(b) has been revised as follows:
 - (b) **On and before April 21, 2006**, ~~To~~ to document compliance with Condition D.1.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin;
 - (2) Method of application and other emission reduction techniques for each resin;
 - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins are used during that month.

- (4) Records of all information, including all reports and notifications required by 326 IAC 20-25.

2. A new condition D.1.17 has been added to include the "operator training" requirements pursuant to 326 IAC 20-56-2 as follows:

D.1.17 Operator Training Requirements [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2:

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

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

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

Source Background and Description

Source Name:	Topp Industries, Inc.
Source Location:	Highway 25 North, Rochester, Indiana 46975
County:	Fulton
SIC Code:	3089
Operation Permit No.:	T049-9015-00018
Operation Permit Issuance Date:	May 31, 2001
Significant Source Modification No.:	049-21788-00018
Significant Permit Modification No.:	049-21798-00018
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 modification application from Topp Industries, Inc. relating to the construction and the operation of the following emission unit:

One (1) non-atomized mechanical resin application unit (flow coaters, flow choppers and/or fluid impingement devices), coating a maximum of 60.18 plastic tank mold units per hour.

The source also requested the following:

- (a) Incorporate the requirements of the federal regulation 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production in the modification.
- (b) Change the description of emission unit A.2(a)(1) in the existing Part 70 permit No. T049-9015-00018 as follows:
 - (4) ~~one (1) gel coat spray~~ **cutting and grinding** booth, constructed in 1992, **with a large and small grinder, trimming a maximum of 5.4 FRP tanks per hour, equipped with** ~~utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;~~
- (c) Remove the following emission units from the existing Part 70 permit no. T049-9015-00018:
 - (1) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
 - (A) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;
 - (B) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
 - (C) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) Part 70 permit No. T049-9015-00018 issued on May 31, 2001;
- (b) First administrative amendment No. 049-14806-00018 issued on September 19, 2001;
- (c) Second administrative amendment No. 049-17294-00018 issued on September 18, 2003;
- (d) First significant permit modification No. 049-19887-00018 issued on March 21, 2005; and
- (e) Third administrative amendment No. 049-20776-00018 issued on April 15, 2005.

Enforcement Issue

There are no pending enforcement actions related to this proposed modification.

Recommendation

The staff recommends to the Commissioner that the 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 September 7, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1).

Potential To Emit of Modification Before Controls

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

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	10.14
CO	0.00
NO _x	0.00
HAPs	10.14

Justification for Modification

The Title V permit is being modified through a Significant Source Modification and Significant Permit Modification. This modification has a potential to emit greater than ten (10) tons per year (10.14 tons per year) of a single hazardous air pollutant (Styrene). Therefore, pursuant to 326 IAC 2-7-10.5(f)(6) the modification shall be processed in accordance with the procedures in 326 IAC 2-7-10.5(g).

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM-2.5	attainment or unclassifiable
PM-10	attainment
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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Fulton County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Fulton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/year)
PM	0.32
PM-10	0.28
SO ₂	0.00
VOC	96.78
CO	0.00
NOx	0.00

- (a) This existing source is not a major stationary source under 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the technical support document for Part 70 Permit No. 049-9015-00018 and technical support document for Part 70 Significant Permit Modification No. 049-19887-00018.

Potential to Emit After Issuance for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (PTE) of Modification After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Fiberglass winding unit	-	-	-	10.14	-	-	10.14	10.14
Total Modification Emissions	-	-	-	10.14	-	-	10.14	10.14
PSD Significant Modification Thresholds	250	250	250	250	250	250	N/A	N/A

Process/facility	Potential to Emit (PTE) of Source After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Total PTE of Modification	-	-	-	10.14	-	-	10.14	10.14
PTE (Existing Fiberglass winding unit)*	0.00	0.00	-	75.32	-	-	69.67	69.82
PTE (Insignificant VOC Sources)**	0.00	0.00	-	0.21	-	-	0.16	0.16
PTE (Existing Cutting/Grinding)	0.10	0.06	-	-	-	-	-	-
Total PTE for Source after Issuance	0.10	0.06	-	85.67	-	-	79.97	80.12
PSD Threshold	250	250	250	250	250	250	N/A	N/A

*Does not include emissions from the gel coat spray booth as it has been removed from the source.

**Does not include emissions from the paint room (EU-2) for painting metal parts including a spray booth, dip tank and manual application because it has been removed from the source.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source will remain a minor stationary source after the modification since the source wide potential emissions of each attainment regulated pollutant shall be less than 250 tons per year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The requirements of *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*, (40 CFR 63.5780, Subpart WWWW) are included in the permit for this source because this source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Amendments to this subpart were final on August 25, 2005, and effective on October 24, 2005. However, 326 IAC 20-56 still references the previous version of the rule, from 68 FR 19402, April 21, 2003. Therefore, pursuant to 326 IAC 20-56, the Permittee must comply with the previous version of the rule, and pursuant to 40 CFR 63, Subpart WWWW, the Permittee must comply with the current version of the rule. The specific requirements of the previous version of the rule which were changed in these amendments are specified under "326 IAC 56" in the "State Rule Applicability" section of this document. All other requirements of 326 IAC 20-56 are the same as those still specified in the federal rule. When the revised rule is incorporated into the SIP, the Permittee may apply for a revision to the permit to remove any requirements from the previous version of the rule that are not present in the updated version of the rule.

Construction of this source commenced prior to August 2, 2001. Therefore, this is an existing affected source. The processes currently existing at this source subject to the rule include open molding, manual resin application, nonatomized mechanical resin application (nonvapor-suppressed resin). This source does not have any centrifugal casting or continuous lamination/casting operations. The specific facilities include the following:

one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:

one (1) resin application area consisting of seven (7) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 421.3 plastic tank mold units per hour. The spray application units are located in:

- (1) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
- (2) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).

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

- (a) 40 CFR 63.5800;
- (b) 40 CFR 63.5805(b);
- (c) 40 CFR 63.5810;
- (d) 40 CFR 63.5835(a) and (c);
- (e) 40 CFR 63.5840;
- (f) 40 CFR 63.5860(a);
- (g) 40 CFR 63.5895 (c) and (d);

- (h) 40 CFR 63.5900(a)(2), (3) and (4), (b) and (c);
- (i) 40 CFR 63.5905;
- (j) 40 CFR 63.5910(a), (b), (c), (d), (g) and (h);
- (k) 40 CFR 63.5915(a), (c) and (d);
- (l) 40 CFR 63.5920;
- (m) 40 CFR 63.5925;
- (n) 40 CFR 63.5930; and
- (o) 40 CFR 63.5935.

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

- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
 - (3) the unit has a potential to emit (PTE) before controls of the applicable regulated air pollutant equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued Part 70 permit No. T049-9015-00018 on May 31, 2001. The new fiberglass winding unit and each of the six (6) existing fiberglass winding units, has uncontrolled PTE of Styrene at greater than 100 percent of the applicable major Part 70 threshold for a single hazardous air pollutant (ten (10) tons per year). However, these units are not subject to an emission limitation or standard for the applicable regulated air pollutant. Moreover, the winding units are subject to the requirements of 40 CFR 63, Subpart WWWW, which are section 112 emission limits established after November 15, 1990. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, do not apply to this source.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

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

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of a combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to a major source of HAPs specifically regulated by Section 112(d) of the Clean Air Act. Since the facilities at this source are regulated by Section 112(d) (i.e., 40 CFR 63, Subpart WWWW), the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this modification or to this source.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

- (a) The seven (7) non-atomized fluid impingement units are not subject to this rule because there are no PM emissions from these facilities.
- (b) The particulate matter (PM) from the cutting and grinding booth with a large and small grinder, shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on 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:

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

The cutting and grinding operation is equipped with a dry filter for particulate control. The maximum uncontrolled particulate emission rate from the cutting and grinding operation is 1.55 pounds per hour, and with dry filter, the maximum controlled particulate emission rate from the cutting and grinding operation is 0.02 pounds per hour, which is less than 1.15 pounds of particulate per hour. Therefore, the cutting and grinding operation shall comply with 326 IAC 6-3-2 by using a dry filter for particulate control at all times during operation.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year, not regulated by other provisions of Article 8. The potential VOC emissions from the new winding unit at the existing fiberglass reinforced plastics tank and related sewer parts manufacturing source are 10.14 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this modification.

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

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

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

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

On and before April 21, 2006, pursuant to 326 IAC 20-25-3, the owners or operators of the fiberglass operation shall comply with the provisions of this rule.

326 IAC 20-56 (Reinforced Plastics Composites Production)

This rule incorporates by reference the previous version of 40 CFR 63, Subpart WWWW, from 68 FR 19402, April 21, 2003. The requirements of this rule are the same for this source as the requirements of the current version of the rule, applicable pursuant to 40 CFR 63.5780, except for the following:

- (a) 40 CFR 63.5805
- (b) 40 CFR 63.5810
- (c) 40 CFR 63.5895(d)
- (d) 40 CFR 63.5900
- (e) 40 CFR 63.5935

There are also changes in Tables 1, 3, 4, 7, 8 and 9 that change the requirements of the rule for this source.

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.

This modification does not have any specific compliance monitoring requirements.

There are no PM emissions from the seven (7) non-atomized fluid impingement units. Therefore, they do not have any compliance monitoring requirements.

There are no specific compliance monitoring requirements applicable to the cutting and grinding operation, because it has a dry filter as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T049-9015-00018). In addition to the changes specified below revisions are made to the Table of Contents and condition numbers pursuant to addition of new conditions and deletion of existing conditions without replication herein.

1. Section A.2, Emission Units and Pollution Control Equipment Summary has been revised to reflect the addition of the new winding unit and the deletion of the gel coat spray booth and the paint room, EU-02, as follows:

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:

- (a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
 - (4 a) one (1) ~~gel coat spray~~ **cutting and grinding** booth, constructed in 1992, **with a large and small grinder, trimming a maximum of 5.4 FRP tanks per hour, equipped with** utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). ~~This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;~~
 - (2 b) one (1) resin application area consisting of ~~six (6)~~ **seven (7)** non-atomized ~~spray~~ **mechanical resin** application units (**flow coaters, flow choppers and/or fluid impingement devices**), each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of ~~361.4~~ **421.3** plastic tank mold units per hour. The spray application units are located in:
 - (A 1) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and
 - (B 2) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).
- ~~(b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
 - ~~(1) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;~~
 - ~~(2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and~~
 - ~~(3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).~~~~

2. Section D.1 has been revised to reflect the addition of the new winding unit and the deletion of the gel coat spray booth and the paint room, EU-02, as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) ~~one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:~~
- ~~(4 a) one (1) gel coat spray cutting and grinding booth, constructed in 1992, with a large and small grinder, trimming a maximum of 5.4 FRP tanks per hour, equipped with utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;~~
 - ~~(2 b) one (1) resin application area consisting of six (6) **seven (7)** non-atomized spray mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of ~~361.4~~ **421.3** plastic tank mold units per hour. The spray application units are located in:~~
 - ~~(A 1) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and~~
 - ~~(B 2) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).~~
- (b) ~~one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:~~
- ~~(1) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;~~
 - ~~(2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and~~
 - ~~(3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).~~

(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 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.1.2 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 this condition.~~
- ~~(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:~~
- ~~(1) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:~~
- ~~(A) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;~~
- ~~(B) one (1) resin application area consisting of six (6) non-atomized spray application units, each coating a maximum of 60.18 plastic tank mold units per hour, for a total maximum of 361.1 plastic tank mold units per hour. The spray application units are located in:~~
- ~~(i) two (2) spray booths constructed in 1992, with dry filters for particulate matter (PM) overspray control, exhausting at two (2) stacks (ID Nos. V2 and V3), and~~
- ~~(ii) one (1) winding room, initially constructed in 1992 and modified in 2004, with dry filters for particulate matter (PM) overspray control, exhausting at three (3) stacks (ID Nos. V4, V5 and V7).~~
- ~~(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.~~

~~D.1.3 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) no later than August 19, 2003.~~
- ~~(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, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

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

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

D.1.41 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the gel coat spray booth and the resin application area shall be the following:

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months.
- (1) Potential VOC emissions from the use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in the FRP tank production process are less than 99 tons per year. Any change or modification that would increase the potential VOC emissions from the FRP tank production process to greater than 99 tons per year shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.

- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. ~~Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis.~~ If all of the resins ~~and/or gel coats~~ used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition ~~D.1.10~~ **D.1.6** is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. If non-compliant resins ~~or gel coats~~ are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

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

~~(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).~~

Where: Emissions, lb or ton = M (mass of resin ~~or gel coat used~~, lb or ton) * EF
(Monomer emission factor for resin ~~or gel coat used~~, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each ~~gel coat and~~ resin used.

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, impingement guns, pressure-feed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for ~~gel coats and~~ filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.52 HAP Emission Standards [326 IAC 20-25-3]

On and before April 21, 2006, pursuant to 326 IAC 20-25-3, the Permittee shall comply with the provisions of the rule, including:

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

<i>Fiber Reinforced Plastics Composites Products Except Watercraft</i>	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as specified in following condition D.1.52 (b).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition ~~D.1.18~~ **D.1.10** is sufficient for demonstrating compliance with the HAP monomer content limits.

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

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

For averaging within a category:

$$\sum E_{m_A} \leq \sum (M_R * E_a)$$

where M_R = Total monthly mass of material within each category

E_{Ma} = Emission factor for each material based on allowable monomer content and allowable application method for each category

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

Units: mass = tons

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

emissions = lbs of monomer

Note: Fillers may not be included when averaging

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

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

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

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

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

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

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

~~D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]~~

~~Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth in the paint room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.~~

~~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.1.73 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~(a) Pursuant to 326 IAC 6-3-2, the PM from the gel coat spray booth, the resin application area, and the paint spray booth in the paint room, shall not exceed the pound per hour~~

~~emission rate established as E in the following formula:~~

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

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

- ~~(b) The particulate matter (PM) from the cutting and grinding booth with a large and small grinder shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on 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:~~

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

D.1.84 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.95 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

On and before April 21, 2006, pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials
 - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.406 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

On and before April 21, 2006, pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

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

Compliance Determination Requirements

D.1.417 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]

Compliance with the HAP monomer content limitations in condition ~~D.1.5~~ **D.1.2** shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:

- (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
- (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (C) Upon written application by the source, the commissioner may approve an alternative test method.

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

D.1.12 Volatile Organic Compounds (VOC)

~~Compliance with the VOC content and usage limitations contained in Condition D.1.6 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.1.138 VOC Emissions

~~Compliance with Condition D.1.4 D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in Condition D.1.18 D.1.10.~~

D.1.14 Particulate Matter (PM)

~~The dry filters for PM control shall be in operation at all times when the gel coat spray booth, the equipment of the resin application area, and the paint spray booth are in operation.~~

D.1.159 Volatile Organic Compounds (VOC)

- (a) Use of resins, ~~gel coats~~ and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin ~~and gel coat~~ applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each ~~gel coat and~~ resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each ~~gel coat and~~ resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each ~~gel coat and~~ resin, and summing the emissions for all ~~gel coats and~~ resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed ~~32.3% styrene emitted per weight of gel coat applied and~~ 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. ~~Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis.~~ If all of the resins ~~and/or gel coats~~ used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition ~~D.1.18~~ **D.1.10** is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins ~~or gel coats~~ are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

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

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{(\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin or } <37\% \text{ gel coat, and or other emission reduction techniques})} \leq$$

Where: Emissions, lb or ton = M (mass of resin ~~or gel coat~~ used, lb or ton) * EF
(Monomer emission factor for resin ~~or gel coat~~ used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each ~~gel coat and~~ resin used.

D.1.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the cutting and grinding booth with a large and small grinder at all times that the cutting and grinding booth is in operation.

D.1.16 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 gel coat spray booth, the two (2) resin chop spray booths, the winding room, and the paint spray booth stacks (V1, V2, V3, V4, V5, V6 and V7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring 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 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.~~
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

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

~~D.1.17 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 Part 70 permit.~~

- ~~(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart WWWW, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~
- ~~(b) The significant permit modification application shall be submitted no later than nine months before April 21, 2006.~~
- ~~(c) The significant permit modification application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~D.1.1811 Record Keeping Requirements [326 IAC 20-25-6(b)] [326 IAC 20-25-8]~~

- ~~(a) To document compliance with Conditions ~~D.1.4 D.1.1 and D.1.6~~, the Permittee shall maintain records in accordance with (1) through (8 ~~3~~) below. Records maintained for (1) through (8 ~~3~~) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions ~~D.1.4 D.1.1 and D.1.6~~.~~
- ~~(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each ~~gel coat and resin used in the gel coat spray booth and resin application area~~. The amount and VOC content of each solvent used shall also be recorded. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- ~~(2) The amount and VOC content of each coating material and solvent used in the paint spray booth. 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;~~
- ~~(3) A log of the dates of use in each booth;~~

- ~~(4)~~ The volume weighted VOC content of the coatings used in the paint spray booth for each day that coatings with a VOC content greater than 3.5 pounds per gallon are used;
- ~~(5)~~ The cleanup solvent usage for each month;
- ~~(6)~~ The total VOC usage for each month;
- ~~(72)~~ The monomer content of resins and gel coats shall be calculated on a neat basis, i.e., excluding any filler, for each month in which noncompliant resins and gel coats are used; and
- ~~(83)~~ The weight of VOCs emitted for each compliance period.
- (A) VOC emissions from the gel coat spray booth and the resin application area shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (C) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.16. Monthly purchase orders, invoices and material safety data sheets (MSDS) shall be sufficient to allow calculation of monthly VOC emissions from the FRP process.
- (b) To document compliance with Condition ~~D.1.5~~ **D.1.2**, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Such records shall be recorded in a form suitable and readily available for inspection and review. Except for records of prior training programs and former personnel, the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Examples of such records include but are not limited to:
- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
- (2) Method of application and other emission reduction techniques for each resin and gel coat used;
- (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

- (4) Records of all information, including all reports and notifications required by 326 IAC 20-25.
- ~~(c) To document compliance with Condition D.1.16, 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 [326 IAC 20-25-7]

A quarterly summary of the information to document compliance with Conditions ~~D.1.5~~ **D.1.2** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the quarter being reported.

D.1.13 General Provisions Relating to NESHAP Subpart WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

D.1.14 NESHAP Subpart WWWW Requirements [40 CFR Part 63, Subpart WWWW]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780 by April 21, 2006, as specified below:

Compliance Dates and Standards

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

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

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

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

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

Options for Meeting Standards

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

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Sec. 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

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

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

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

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i , lbs/ton;
 Material $_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;
 n =number of process streams where you calculated an organic HAP emissions factor.

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

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

(c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

**ELi=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;
Materiali=neat resin plus or neat gel coat plus used during the last 12-month period for
operation type i, tons; n=number of operations.**

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

**Actual Individual EFi=Actual organic HAP emissions factor for operation type i, lbs/ton;
Materiali=neat resin plus or neat gel coat plus used during the last 12 calendar months for
operation type i, tons; n=number of operations.**

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

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

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

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

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

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

General Compliance Requirements

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

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

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

Testing and Initial Compliance Requirements

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

Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.

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

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

Continuous Compliance Requirements

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

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

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

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

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

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

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

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

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

(c) During periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

Notifications, Reports, and Records

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

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

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

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

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

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

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

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

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

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

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

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

(1) Company name and address.

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

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

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

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

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

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

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

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

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

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

§ 63.5915 *What records must I keep?*

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

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

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

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

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

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

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

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

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

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

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

Other Requirements and Information

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

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

§ 63.5930 *Who implements and enforces this subpart?*

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

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

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

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

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

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

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

§ 63.5935 *What definitions apply to this subpart?*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Corrosion-resistant resin means a resin that either:

- (1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH ≥ 12.0 or ≤ 3.0 , oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or
- (2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mechanical resin application means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools

such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

As required in §§63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams you must use the equations in the following table:

If your operation type is a new or existing...	And you use .	With . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ³⁴ . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ³⁴ . .
1. Open molding operation	a. Manual resin application.	i. Nonvapor-suppressed resin. ii. Vapor-suppressed resin.	EF = 0.126 x % HAP x 2000. EF = 0.126 x % HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor)).
	c. Nonatomized Mechanical resin application.	v. Nonvapor-suppressed resin.	EF = 0.107 x % HAP x 2000.	EF = ((0.157 x %HAP)-0.0165) x 2000

Footnotes to Table 1

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.

³ The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

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

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

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

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

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

If your operation is...	And you use...	Your organic HAP emissions limit is ¹
3. Open molding-tooling	b. Manual resin application	157 lb/ton

Footnotes to Table 3

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

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

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

For . . .	You must . . .
2. A new or existing cleaning operation.	Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. A new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

Table 5 to Subpart WWWW of Part 63—Alternative Organic HAP Emissions Limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations Where the Standard are Based on a 95 Percent Reduction Requirement

As specified in §63.5805, as an alternative to the 95 percent organic HAP emissions reductions requirement, you may meet the appropriate organic HAP emissions limits in the following table:

If your operation type is . . .	And you use . . .	Your organic HAP emissions limit is a ¹ . . .
3. Open molding-tooling.....	a. Mechanical resin application.	13 lb/ton.
	b. Manual resin application.	8 lb/ton.

¹ Organic HAP emissions limits for open molding and centrifugal casting expressed as lb/ton are calculated using the equations shown in Table 1 to this subpart. You must be at or below these values based on a 12-month rolling average.

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

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

If your facility has the following resin type and application method . . .	The highest resin Weight is*** percent organic HAP content, or weighted average weight percent organic HAP content, you can use for .	Is . . .
8. Tooling resins, manual.....	Tooling manual	91.4

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

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

For . . .	That must meet the following organic HAP emissions limit..	You have demonstrated initial compliance if..
1. Open molding and centrifugal casting operations.	a. An organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.	i. You have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, or ii. You demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or

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

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards

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

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
2. A new or existing cleaning operation.	Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

<p>3. A new or existing materials HAP-containing materials storage operation.</p>	<p>Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.</p>	<p>The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.</p>
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Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications

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

If your facility . . .	You must submit . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facility's compliance date.

Table 14 to Subpart WWWW of Part 63—Requirements for Reports
As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

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

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

D.1.15 NESHAP WWWW Requirements [326 IAC 20-56]

Pursuant to 326 IAC 20-56, the Permittee shall comply with the previous version of 40 CFR 63, Subpart WWWW, published in 68 FR 19402, April 21, 2003 with a compliance date of April 21, 2006. Compliance with the requirements specified in Condition D.1.14 shall satisfy the requirements of 326 IAC 20-56, with the exception of the requirements listed under 40 CFR 63.5805, 40 CFR 63.5810, CFR 63.5895(d), CFR 63.5900, CFR 63.5935 and Tables 1, 3, 4, 7, 8 and 9. In place of those requirements, to satisfy 326 IAC 20-56 only, the Permittee shall comply with the following:

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

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

(a) If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous lamination/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

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

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards in §63.5805. When you are complying with an emission limit in Tables 3 or 5 to this subpart, you may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all of your emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are currently using unless you were using the compliant materials option in paragraph (d) of this section. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Meet the individual organic HAP emissions limits for each operation.* Demonstrate that you meet the individual organic HAP emissions limits for each open molding operation and for each centrifugal casting operation type in Tables 3, or 5 to this subpart that apply to you. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method you use in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. Your calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 to this subpart based on a 12-month rolling average. Use the procedures described in paragraphs (a)(1) through (3) of this section to calculate average organic HAP emissions factors for each of your operations.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: The neat resin plus or neat gel coat plus organic HAP content, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. If you want to use vapor suppressants to meet the organic HAP emissions limit for open molding, you must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of appendix A to subpart WWWW of 40 CFR part 63.

(2) Calculate your actual operation organic HAP emissions factor for the last 12 months for each open molding operation type and for each centrifugal casting operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that correspond to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type. Use Equation 2 of this section to calculate your actual organic HAP emissions factor for each open molding operation type and each centrifugal casting operation type.

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

Where:

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

Material_i =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons

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

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

(b) *HAP Emissions factor averaging option.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Tables 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Tables 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months. Use Equation 3 of this section to calculate the weighted average organic HAP emissions limit for all open molding operations and separately for all centrifugal casting operations.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3, 5 or 7 to this subpart

Material_i =neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons

n=number of operations

(2) Each month calculate your actual weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations. You must calculate your actual individual HAP emissions factors for each operation type as described in paragraphs (a)(1) and (2) of this section. Use Equation 4 of this section to calculate your actual weighted average organic HAP emissions factor.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type i, lbs/ton

Material_i =neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons

n=number of operations

(3) Compare the values calculated in paragraphs (b)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(c) If you have multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resin(s) for all operations of that resin type. If you have more than one operation type, you may meet the emission limit for one of those operations, and use the same resin(s) in all other open molding and centrifugal casting operations.

(1) This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

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

(3) You may also use a weighted average organic HAP content for each operation described in paragraph (c)(2) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in §63.5810(a)(2) except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

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

(d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to this subpart.

Continuous Compliance Requirements

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

(d) If you initially demonstrate that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then resin and gel coat use records are not required. However, you must include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits for compliant resins and gel coats shown in Tables 3 or 7 to this subpart. If after this initial demonstration, you change to a higher organic HAP resin or gel coat, or increase the resin or gel coat organic HAP content, or change to a higher emitting resin or gel coat application method, then you must either again demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or begin collecting resin and gel coat use records and calculate compliance on a 12- month rolling average.

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

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

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

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than

or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in § 63.5895(d).

§ 63.5935 What definitions apply to this subpart?

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

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

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

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

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

Table 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams¹

[As specified in §§63.5796, 63.5799(a)(1) and (b), and 635810(a)(1), to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams you must use the equations in the following table:]

If your operation type is a new or existing....	And you use . .	With . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ^{1 2 3} . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ^{1 2 3} . . .
1. Open molding operation	a. Manual resin application.	i. Nonvapor-suppressed resin. ii. Vapor-suppressed resin.	EF = 0.126 x % HAP x 2000. EF = 0.126 x % HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor)).
	c. Nonatomized Mechanical resin application.	i. Nonvapor-suppressed resin.	EF = 0.107 x % HAP x 2000.	EF = ((0.157 x %HAP)-0.0165) x 2000

Footnotes to Table 1

2 Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.

3 The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

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

[As required in §§63.5796, 63.5805 (a) through (c) and (g), 63.5810(a), (b), and (d), 63.5820(c), 63.5830, 63.5835(a), 63.5895(c) and (d), 63.5900(a)(2), and 63.5915(c), you must meet the appropriate organic HAP emissions limits in the following table:]

If your operation is....	And you use...	Your organic HAP emissions limit is ¹	And the highest organic HAP content for a compliant resin or gel coat is ²
3. Open molding-tooling	b. Manual resin application	157 lb/ton	45.9

Footnotes to Table 3

1 Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

2 A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.

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

[As required in §§63.5805 (a) through (d) and (g), 63.5835(a), 63.5900(a)(3), 63.5910(c)(5), and 63.5915(d), you must meet the appropriate work practice standards in the following table:]

For . . .	You must . . .
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation.	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

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

[As required in §§63.5810(a) through (d), 63.5835(a), 63.5895(c), and 63.5900(a)(2), when electing to use the same resin(s) for multiple resin application methods you may use any resin(s) with an organic HAP contents less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:]

If your facility has the following resin type and application method . . .	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	Is . . .
8. Tooling resins, manual	Tooling atomized mechanical	45.9

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

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

For . . .	That must meet the following organic HAP emissions limit. . .	You have demonstrated initial compliance if. . .
<p>1. Open molding and centrifugal casting operations.</p>	<p>a. an organic HAP emissions limit shown in Tables 3 and 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart.</p>	<p>i. You have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average¹ year after the appropriate compliance date, or ii. You demonstrate by using the appropriate values in Tables 3, or 7 to this subpart that all resins and gel coats considered individually meet the appropriate organic HAP contents, or iii. You demonstrate by using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.</p>

Table 9 to Subpart WWWW of Part 63—Initial Compliance with Work Practice Standards

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

For . . .	That must meet the following standards. . .	You have demonstrated initial compliance if. . .
2. a new or existing cleaning operation	Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
3. a new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing material, and that any bulk storage tanks are vented only as necessary for safety.

D.1.16 One Time Deadlines Relating to NESHAP Subpart WWWW

- (a) The Permittee shall conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
- (b) The Permittee must submit a notification of compliance status before the close of business on the 60th day following the completion of compliance demonstration.
- 3. The IDEM P.O. box and the zip code have been revised throughout the permit to reflect the current IDEM mailing address.
- 4. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. Therefore, a new condition B.26 has been added as follows:

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

5. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised as follows to remove (a) which contained these requirements:

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

- (a) ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.~~
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~
6. The Insignificant grinding and machining operation (the small grinder) described in section D.2 has been combined with the large grinding operation described in section D.1 and therefore, the entire Section D.2 has been removed from the Part 70 Permit.
7. Since the source is located in Fulton County, the opacity limit should be forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Therefore Condition C.2 has been revised as follows:

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of ~~twenty~~ **forty** percent (~~20~~ **40**%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Conclusion

The construction and operation of the non-atomized spray application unit shall be subject to the conditions of the attached proposed Significant Source Modification No.:049-21788-00018 and Significant Permit Modification No.: 049-21798-00018.

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Fiberglass Processes**

**Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Part 70 SSM No.: 049-21788-00018
Part 70 SPM No.: 049-21798-00018
Reviewer: Seema Roy/EVP**

Uncontrolled Potential Emissions:												
Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor lb emitted per ton resin/gel- coat processed	Gal of Mat (gal/unit)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC/HAPs pounds per hour	Potential VOC/HAPs pounds per day	Potential VOC/HAPs tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Mechanical Non-Atomized and Filament Winding Resin Application - FRP Production**												
Polyster Resin H-834-QAC or RLC	9.17	35.00%	77.00	0.10900	60.18	Unknown	2.32	55.58	10.14	0.00	#DIV/0!	100.00%
Total Uncontrolled Potential Emissions:							2.32	55.58	10.14	0.00		

Methodology:

Potential VOC Pounds per Hour = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * Emission Factor

Potential VOC Pounds per Day = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * (24 hr/day) * Emission Factor

Potential VOC Tons per Year = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (1 ton/2000 lbs) * Emission Factor * (8760 hrs/yr) * 1 ton/2000 lbs

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Controlled VOC emission rate = uncontrolled emission rate * Material usage limitation

Controlled PM emission rate = uncontrolled emission rate * (1 - control efficiency) * Material usage limitation

Emission Factors are based on the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, July, 2001.