



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: January 26, 2007  
RE: Better Way partners, LLC, dba Better Way Products / 039-23169-00141  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **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.dot 03/23/06



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
Governor

January 26, 2007

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
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Thomas W. Easterly  
Commissioner

Bruce Korenstra  
Better Way Partners, LLC (d/b/a Better Way Products)  
70891 CR 23  
New Paris, Indiana 46553

Re: 039-23169-00141  
Significant Source Modification to:  
Part 70 Operating Permit No.: T 039-7106-00141

Dear Mr. Korenstra:

Better Way Partners, LLC (d/b/a Better Way Products) was issued a Part 70 Operating Permit T 039-7106-00141 on December 30, 1999 for a fiberglass operation located at 70891 CR 23, New Paris, Indiana 46553. An application to modify the source was received on June 2, 2006. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction and modification at the source:

- (a) One (1) grinding booth, identified as P2-GRIND#1, approved for construction in 2007, with a maximum of 4 grinders, with a maximum capacity of 504 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S5.
- (b) One (1) grinding booth, identified as P2-GRIND#2, constructed in 1996 and approved for modification in 2007, with a maximum of 4 grinders, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S6.

The following construction conditions are applicable to the proposed project:

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

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 contact Frank P. Castelli, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251, at 631-691-3395, ext. 13 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

*Original document signed by*

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

FPC/MES

Attachments: TSD and Significant Source Modification

cc: File - Elkhart County  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Greg Wingstrom  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Better Way Partners, LLC (d/b/a Better Way Products)  
70891 C.R. 23  
New Paris, Indiana 46553**

(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. **This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.**

Operation Permit No.: T 039-7106-00141	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 30, 1999  Expiration Date: December 31, 2004
Significant Source Modification No. 039-23169-00141	Conditions Affected: A.2, B.13, D.1.5, D.1.12, D.1.14 and Report Form Condition Added: D.1.6
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 26, 2007

## SECTION A SOURCE SUMMARY

### 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:

#### **Plant 2:**

- (a) One (1) gelcoat booth, identified as P2-G, constructed in 1996, with a maximum capacity of 143.6 pounds per hour, using mechanical atomized applicators and dry filters as control, and exhausting to stack S4. This is an open molding process.
- (b) One (1) resin chop area, identified as P2-R, constructed in 1996, with a maximum capacity of 322.1 pounds per hour, using mechanical non-atomized applicators and dry filters as control, and exhausting to stacks S7 and S8. This is an open molding process.
- (c) One (1) gelcoat/resin chop application area, identified as P2-LTGR, constructed in 2003, for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using mechanical non-atomized applicators and dry filters as control, and exhausting to stacks S2 and S3. This is an open molding process.
- (d) One (1) grinding booth, identified as P2-GRIND#1, approved for construction in 2007, with a maximum of 4 grinders, with a maximum capacity of 504 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S5.
- (e) One (1) grinding booth, identified as P2-GRIND#2, constructed in 1996 and approved for modification in 2007, with a maximum of 4 grinders, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S6.

#### **Plant 1:**

- (f) Two (2) gelcoat booths, known as P1-G1 and P1-G2, with P1-G1 constructed in 1998 and P1-G2 constructed in 2003, each equipped with mechanical atomized applicators and dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively. This is an open molding process.
- (g) One (1) resin booth, known as P1-R, constructed in 1998, equipped with mechanical non-atomized applicators and dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13. This is an open molding process.
- (h) One (1) gelcoat booth, identified as P1-G3, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical atomized applicators and dry filters for overspray control, exhausting to stack S16. This is an open molding process.
- (i) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical non-atomized applicators and dry filters for overspray control, exhausting to stack S15. This is an open molding process.
- (j) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control, exhausting to stacks S9, S10, and S14.
- (k) One (1) Resin Transfer Molding (RTM) area, constructed in 2003, using an injection molding, closed molding process, using 30,000 pounds per year of styreneated resins.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

#### Plant 2:

- (a) One (1) gelcoat booth, identified as P2-G, constructed in 1996, with a maximum capacity of 143.6 pounds per hour, using mechanical atomized applicators and dry filters as control, and exhausting to stack S4. This is an open molding process.
- (b) One (1) resin chop area, identified as P2-R, constructed in 1996, with a maximum capacity of 322.1 pounds per hour, using mechanical non-atomized applicators and dry filters as control, and exhausting to stacks S7 and S8. This is an open molding process.
- (c) One (1) gelcoat/resin chop application area, identified as P2-LTGR, constructed in 2003, for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using mechanical non-atomized applicators and dry filters as control, and exhausting to stacks S2 and S3. This is an open molding process.
- (d) One (1) grinding booth, identified as P2-GRIND#1, approved for construction in 2007, with a maximum of 4 grinders, with a maximum capacity of 504 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S5.
- (e) One (1) grinding booth, identified as P2-GRIND#2, constructed in 1996 and approved for modification in 2007, with a maximum of 4 grinders, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S6.

#### Plant 1:

- (f) Two (2) gelcoat booths, known as P1-G1 and P1-G2, with P1-G1 constructed in 1998 and P1-G2 constructed in 2003, each equipped with mechanical atomized applicators and dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively. This is an open molding process.
- (g) One (1) resin booth, known as P1-R, constructed in 1998, equipped with mechanical non-atomized applicators and dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13. This is an open molding process.
- (h) One (1) gelcoat booth, identified as P1-G3, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical atomized applicators and dry filters for overspray control, exhausting to stack S16. This is an open molding process.
- (i) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical non-atomized applicators and dry filters for overspray control, exhausting to stack S15. This is an open molding process.
- (j) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control, exhausting to stacks S9, S10, and S14.
- (k) One (1) Resin Transfer Molding (RTM) area, constructed in 2003, using an injection molding, closed molding process, using 30,000 pounds per year of styreneated resins.

Insignificant Activity:

- (e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, mold release, use of sealers, primers, wood glues, and promoter solutions, mold repair activities, and grinding. The mold making consists of an open molding tooling process.

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

- (a) The PM from the fiberglass lamination production processes in Plant 1 and Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the P2-GRIND#1 shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.252 tons per hour.

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

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

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

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the P2-GRIND#2 shall not exceed 0.923 pounds per hour when operating at a process weight rate of 0.108 tons per hour.

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

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

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

**D.1.6 Particulate Matter (PM) and PM<sub>10</sub> Limitations [326 IAC 2-2]**

Compliance with the following emission limits renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the grinding booth, identified as P2-GRIND#1.

- (a) The particulate matter emissions shall be less than 5.70 pounds per hour, and  
(b) The PM<sub>10</sub> emissions shall be less than 3.42 pounds per hour.

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

### **D.1.13 Particulate Matter (PM)**

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- (a) The dry filters for PM control shall be in operation at all times when the grinding booth, identified as P2-GRIND#1, and/or the grinding booth, identified as P2-GRIND#2, in Plant 2 is in operation.
- (b) The dry filters shall be in operation at all times when the grinding area in Plant 1 is in operation.

### **D.1.15 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP monomer usage limits and/or the VOC and HAP monomer emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The non-acetone cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
  - (6) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.14, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain the following training records:
  - (1) A copy of the current training program.
  - (2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (d) The Permittee shall calculate and maintain a record of the annual emissions from the open molding and grinding operations in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the installation of grinding booth, identified as P2-GRIND#1.

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Better Way Partners, LLC (d/b/a Better Way Products)  
Source Location: 70891 C. R. 23, New Paris, IN 46553  
Mailing Address: 70891 C. R. 23, New Paris, IN 46553  
Part 70 Permit No. T039-7106-00141

Page 1 of 2

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and X The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) X The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

Indiana Department of Environmental Management  
Office of Air Quality

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

Source Description and Location

Source Name:	Better Way Partners, LLC (d/b/a Better Way Products)
Source Location:	70891 CR 23, New Paris, Indiana 46553
County:	Elkhart
SIC Code:	3089
Operation Permit No.:	T 039-7106-00141
Operation Permit Issuance Date:	December 30, 1999
Significant Source Modification No.:	SSM 039-23169-00141
Significant Permit Modification No.:	SPM 039-23427-00141
Permit Reviewer:	Frank P. Castelli

Existing Approvals

The source was issued a Part 70 Operating Permit T 039-7106-00141 on December 30, 1999. The source has since received the following approvals:

- (a) Administrative Amendment No 039-12115-00141 was issued on July 6, 2000,
- (b) Significant Permit Modification No. 039-12527-00141 was issued on November 2, 2000,
- (c) Significant Permit Modification No. 039-17623-00141 was issued on July 25, 2003,
- (d) Significant Permit Modification No. 039-17869-00141 was issued on October 9, 2003,
- (e) Reopening 039-13212-00141 was issued on November 1, 2001
- (f) Minor Permit Modification 039-21115-00141 was issued on July 20, 2005, and
- (g) Significant Permit Modification 039-21500 was issued on March 15, 2006.

County Attainment Status

The source is located in Elkhart County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Source Status</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	117
PM <sub>10</sub>	117
SO <sub>2</sub>	0.014
VOC	249
CO	0.615
NO <sub>x</sub>	2.33

- (a) This existing source is a major stationary source pursuant to 326 IAC 2-3, Emission Offset, because a nonattainment regulated pollutant (VOC for the 8-hour ozone standard) is emitted at a rate of one hundred (100) tons per year or more.
- (b) This existing source is not a major stationary source pursuant to 326 IAC 2-2, PSD, because no attainment regulated pollutant is emitted at a rate of two hundred and fifty (250) tons per year, and this source is not in one of the twenty-eight listed source categories.
- (c) These emissions are based upon the TSD to Significant Permit Modification No.: 039-21500-00141, issued on March 15, 2006, which is the most recent modification for this source.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Styrene	Greater than 10
Methyl Methacrylate	Greater than 10
TOTAL	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	130
CO	-
NO <sub>x</sub>	-
HAP (specify)	-

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Better Way Partners, LLC (d/b/a Better Way Products) on June 2, 2006, relating to the modification and renaming of the existing grinding booth in Plant 2. This booth is currently identified as P2-GRIND and will be renamed P2-GRIND#2. In addition, a new booth will be constructed and identified as P2-GRIND#1.

The combined, total capacity of both grinding booths will be the same as the capacity of the existing booth, P2-GRIND, 720 pounds of fiberglass part per hour. The capacity of the existing booth has been reduced from 720 to 216 pounds per hour. The new proposed booth, P2-GRIND#1 will have a capacity of 504 pounds per hour.

There will be no more than four (4) grinders to be located in each of the booths, but the capacities are as stated above and are a function of the type of parts that will be ground in each of the grinding booths.

The following is a list of the proposed emission units and pollution control devices:

Plant 2:

- (d) One (1) grinding booth, identified as P2-GRIND#1, approved for construction in 2007, with a maximum of 4 grinders, with a maximum capacity of 504 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S5.
- (e) One (1) grinding booth, identified as P2-GRIND#2, constructed in 1996 and approved for modification in 2007, with a maximum of 4 grinders, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S6.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary					
Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S5	P2-GRIND#1	29.0	3.0	22,800	Ambient
S6	P2-GRIND#2	29.0	3.0	22,800	Ambient

Emission Calculations
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The potential PM and PM<sub>10</sub> emissions calculations from the existing grinding booth in Plant #2, identified as P2-GRIND, were determined to be 25.0 pounds per hour, equivalent to a potential to emit of 109.5 tons per year as documented in the Technical Support Document for CP 039-8708-00141 issued March 5, 1998. The new proposed grinding booth, identified as P2-GRIND#1, will process 504 pounds of fiberglass per hour. Therefore, the potential to emit PM and PM<sub>10</sub> from the new proposed grinding booth is 76.7 tons per year before control. Utilizing the 98.5% control efficiency of the dry filters yields a potential to emit PM and PM<sub>10</sub> after controls of 1.15 tons per year.

Permit Level Determination – Part 70
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Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.®

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls of P2-GRIND#1. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	76.7
PM <sub>10</sub>	76.7
SO <sub>2</sub>	-
VOC	-
CO	-
NO <sub>x</sub>	-

HAPs	Potential To Emit (tons/year)
None	None

This source modification is subject to 326 IAC 2-7-10.5(f)(4), since the potential to emit of PM and

PM<sub>10</sub> from this modification is greater than twenty five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d).

<b>Permit Level Determination – PSD or Emission Offset</b>
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The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source/permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
P2-GRIND#1	Less Than 25	Less Than 15	-	-	-	-	-
Total for Modification	Less Than 25	Less Than 15	-	-	-	-	-
Significant Level Threshold	25	15	40	40	100	40	-

The PM and PM<sub>10</sub> emission rates from P2-GRIND#1 shall be limited to less than 5.70 and 3.42 pounds per hour, respectively, equivalent to twenty-five (25) tons per year and fifteen (15) tons per year.

The Permittee has provided information as part of the application for this approval that based on the Actual to Projected Actual test in 326 IAC 2-3-2 this modification at a major stationary source will not be major for Emission Offset under 326 IAC 2-3-1. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Applicability in 326 IAC 2-3-2. Specific record keeping requirements have been added to Section D.1 of the permit.

Process/Emission Unit	Criteria Pollutants (tons per year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Baseline Actual Molding Emissions [1]	Negligible	Negligible	0	174.35	0	0
Projected Actual Molding Emissions [2]	Negligible	Negligible	0	174.35	0	0
Emissions Increase from Existing Molding Emission Units (Row [2] – Row [1]) [3]	No Increase	No Increase	No Increase	No Increase	No Increase	No Increase
Baseline Actual P2-GRIND Emissions [4]	0.26	0.26	0	0	0	0
Projected Actual P2-GRIND#2 Emissions [5]	0.08	0.08	0	0	0	0

Process/Emission Unit	Criteria Pollutants (tons per year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Emissions Increase from the modification to P2-GRIND (Row [5] – Row [4]) [6]	No Increase	No Increase	No Increase	No Increase	No Increase	No Increase
Potential to Emit from P2-GRIND#1 [7]	24.97	14.98	0	0	0	0
Total Emissions Increase from Project (Rows [3+6] + Row [7]) [8]	24.97	14.98	0	0	0	0
Significant Level [9]	25	15	40	40	100	40

"Baseline actual emissions" are defined in 326 IAC 2-3-1(d) as the rate the pollutant was emitted during a consecutive twenty-four (24)-month period within the ten (10) year period immediately preceding the proposed project's construction. For this project the 24-month period occurred from 2002 to 2003. The existing emission units included in this analysis are the open molding and grinding operations.

"Projected actual emissions" are defined in 326 IAC 2-3-1(mm) as future emissions excluding any increase in emissions from the project that could have been accommodated during the consecutive twenty-four (24) month period used to establish the baseline actual emissions. These emissions were projected by the applicant.

In accordance with 326 IAC 2-3-2(c)(3), the emissions increase that is calculated as the sum of the difference between the projected actual emissions and the baseline actual emissions for each emissions unit.

"Significant" is defined in 326 IAC 2-3-1(qq).

<b>Federal Rule Applicability Determination</b>
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The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed modification.
- (c) The new grinding booth, identified as P2-GRIND#1, is not subject to the requirements of 40 CFR 64.1, because the potential particulate emissions before control are less than one hundred tons per year.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
P2-GRIND#1 (PM and PM <sub>10</sub> )	Dry Filters	Y	76.7	PM/PM <sub>10</sub> Less than 25/15	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new unit as part of this modification.

State Rule Applicability Determination
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The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination PSD and Emission Offset section.

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

The operation of new grinding booth, identified as P2-GRIND#1, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the new grinding booth, identified as P2-GRIND#1, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.252 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the existing grinding booth, identified as P2-GRIND#2, shall not exceed 0.923 pounds per hour when operating at a process weight rate of 0.108 tons per hour.

The pounds per hour limitations were calculated with the following equation:

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 dry filters shall be in operation at all times P2-GRIND#1 or P2-GRIND#2 is in operation, in order to comply with this limit.

Since the potential to emit after controls of P2-GRIND#1 is 0.263 pounds of particulate per hour, and the potential to emit after controls of P2-GRIND#2 is 0.112 pounds of particulate per hour, both units can comply with this rule.

Compliance Determination and Monitoring Requirements
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a

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 Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance determination requirements applicable to this modification are as follows:

The proposed grinding booth, identified as P2-GRIND#1 and the existing grinding booth, identified as P2-GRIND#2, have applicable compliance determination conditions as specified below:

The dry filters for particulate control shall be in operation and control emissions from grinding booths, identified as P2-GRIND#1 and P2-GRIND#2, at all times that P2-GRIND#1 or P2-GRIND#2 is in operation.

There are no compliance monitoring requirements for P2-GRIND#1 or the existing P2-GRIND#2 included in the proposed modification.

Proposed Changes
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The changes listed below have been made to Part 70 Operating Permit No. T 039-7106-00141. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Change 1:**

Condition A.2 and Section D.1 have been revised to change the description of the grinding area in Plant 2 and incorporated the proposed grinding booth. All subsequent emission units in the equipment list have been re-lettered in Condition A.2 and in Section D.1:

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:

Plant 2:

(d) ~~Grinding area, identified as P2-GRIND with two (2) grinders, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stacks S5 and S6.~~

**One (1) grinding booth, identified as P2-GRIND#1, approved for construction in 2007, with a maximum of 4 grinders, with a maximum capacity of 504 pounds of fiberglass parts per hour, using dry filters as control, and exhausting to stack S5.**

(e) **One (1) grinding booth, identified as P2-GRIND#2, constructed in 1996 and approved for modification in 2007, with a maximum of 4 grinders, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters**

**as control, and exhausting to stack S6.**

Plant 1:

- (fe) Two (2) gelcoat booths, known as P1-G1 and P1-G2, with P1-G1 constructed in 1998 and P1-G2 constructed in 2003, each equipped with mechanical atomized applicators and dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively. This is an open molding process.
- (gf) One (1) resin booth, known as P1-R, constructed in 1998, equipped with mechanical non-atomized applicators and dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13. This is an open molding process.
- (hg) One (1) gelcoat booth, identified as P1-G3, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical atomized applicators and dry filters for overspray control, exhausting to stack S16. This is an open molding process.
- (ih) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum production capacity of 160 small parts per day, equipped with mechanical non-atomized applicators and dry filters for overspray control, exhausting to stack S15. This is an open molding process.
- (ji) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control, exhausting to stacks S9, S10, and S14.
- (kj) One (1) Resin Transfer Molding (RTM) area, constructed in 2003, using an injection molding, closed molding process, using 30,000 pounds per year of styreneated resins.

**Change 2:**

Condition D.1.5(b) has been revised so that each of the grinding booths, identified as P2-GRIND#1 and P2-GRIND#2, which exhaust to stacks S5 and S6, respectively, have allowable individual particulate emission rates pursuant to 326 IAC 6-3-2 as follows:

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

- (b) Pursuant to ~~326 IAC 6-3-2~~ the PM from the grinding operations in Plant 2, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour, and the PM from the grinding operations in Plant 1 shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.

**Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the P2-GRIND#1 shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.252 tons per hour.**

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

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

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

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the P2-GRIND#2 shall not exceed 0.923 pounds per hour when operating at a process weight rate of 0.108 tons per hour.

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

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

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

### Change 3:

In order to ensure that the PM and PM<sub>10</sub> emissions from the proposed grinding booth, identified as P2-GRIND#1, do not exceed the PSD PM and PM<sub>10</sub> significant levels of twenty-five (25) tons per year and fifteen (15) tons per year, respectively, Condition D.1.6 has been added to the proposed permit as follows:

#### **D.1.6 Particulate Matter (PM) and PM<sub>10</sub> Limitations [326 IAC 2-2]**

**Compliance with the following emission limits renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the grinding booth, identified as P2-GRIND#1.**

- (a) The particulate matter emissions shall be less than 5.70 pounds per hour, and
- (b) The PM<sub>10</sub> emissions shall be less than 3.42 pounds per hour.

### Change 4:

Condition D.1.12 (now D.1.13) has been revised to include the proposed grinding booth as follows:

#### **D.1.13 ~~D.1.12~~ Particulate Matter (PM)**

- (a) Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding booth, identified as P2-GRIND#1, and/or the grinding booth, identified as P2-GRIND#2, grinding area in Plant 2 is in operation.
- (b) The dry filters shall be in operation at all times when the grinding area in Plant 1 is in operation.

### Change 5:

Condition D.1.14 (now D.1.15) has been revised to include record keeping requirements of the future actual emissions after the installation of the proposed grinding booth, identified as P2-GRIND#1, as follows:

#### **D.1.15 ~~D.1.14~~ Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to

establish compliance with the VOC and HAP monomer usage limits and/or the VOC and HAP monomer emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.

- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The non-acetone cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
  - (6) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition **D.1.14** ~~D.1.13~~, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document compliance with Condition **D.1.10** ~~D.1.9~~, the Permittee shall maintain the following training records:
- (1) A copy of the current training program.
  - (2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (d) **The Permittee shall calculate and maintain a record of the annual emissions from the open molding and grinding operations in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the installation of grinding booth, identified as P2-GRIND#1.**
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAQ has decided to make the following additional changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as strikeouts, new language is **bolded**):

**Change 6:**

Condition B.1 (Permit No Defense) has been deleted. This is not in IC 13, but IDEM has the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to Condition B.14 (Permit Shield) (now B.13). Condition B.14 (now B.13) provides for

when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

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~~B.1 — Permit No Defense [IC 13]~~

- ~~(a) — Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) — This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled ~~Δ~~Permit Shield.Ⓢ~~

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

- ~~(a) — This condition provides a permit shield as addressed in 326 IAC 2-7-15.~~
- ~~(b) — This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - ~~(1) — The applicable requirements are included and specifically identified in this permit; or~~
  - ~~(2) — The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~~~
- ~~(c) — If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(d) — No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. 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 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]~~

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:**
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;**

- (2) **The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;**
- (3) **The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and**
- (4) **The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.**
  
- (e) **This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).**
- (f) **This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]**
- (g) **This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]**

**Change 7:**

Condition B.3 (now B.2) has been revised to clarify that the expiration date of all subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of the Part 70 Operating Permit. In addition, if IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

**B.32 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 15-13-6(a)] [13-15-3-6(a)]**

- (a) This permit, **T 039-7106-00141**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.**
- (b) **If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

**Change 8:**

The phone number in Condition B.13 (now B.12) and on the Emergency/Deviation Occurrence Report form have been changed from 317-233-5674 to 317-233-0178 and the fax number has been changed from 317-233-5967 to 317-233-6865.

**Change 9:**

Condition C.4 has been revised to indicate that provisions of 326 IAC 9-1-2 are federally enforceable by deleting the last sentence of the condition as follows:

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

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~~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. The provisions of 326 IAC 9-1-2 are not federally enforceable.~~

**Change 10:**

Conditions C.18 and C.19 have been changed to reflect NSR reform provision at the major sources as follows:

~~C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]~~

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- ~~(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) Records of required monitoring information shall include, where applicable:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
  - ~~(2) The dates analyses were performed;~~
  - ~~(3) The company or entity performing the analyses;~~
  - ~~(4) The analytic techniques or methods used;~~
  - ~~(5) The results of such analyses; and~~
  - ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) Support information shall include, where applicable:~~
- ~~(1) Copies of all reports required by this permit;~~
  - ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) All calibration and maintenance records;~~
  - ~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps~~

~~taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C- Compliance Monitoring Plan- Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

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

~~C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]~~

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The 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 46204-2254~~

- ~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

- ~~(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

- ~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements- Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

- ~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]**

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

**request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.**
  
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit), which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) (select appropriate citations)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:**
  - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:**
    - (A) A description of the project.**
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
      - (i) Baseline actual emissions;**
      - (ii) Projected actual emissions;**
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3) (select appropriate citations); and**
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.**
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within

**sixty (60) days after the end of the year and contain the following:**

- (1) The name, address, and telephone number of the major stationary source.**
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
- (4) Any other information that the Permittee deems fit to include in this report,**

**Reports required in this part shall be submitted to:**

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

**Change 11:**

The reference to 40 CFR 52.21 has been deleted from the PSD minor limit in Condition D.1.1 as follows:

**D.1.1 PSD Minor Limit [326 IAC 2-2]-~~[40 CFR 52.21]~~**

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

<b>Conclusion and Recommendation</b>
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The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-23169-00141 and Significant Permit Modification No. 039-23427-00141. The staff recommends to the Commissioner that these Part 70 Significant Source and Significant Permit Modifications be approved.