



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: September 6, 2007
RE: Topp Industries, Inc. / 049-24550-00018
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

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
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September 6, 2007

Mr. Dale Graham
Topp Industries, Inc.
P.O. Box 420
Rochester, Indiana 46975

RE: 049-24550-00018
Third Significant Source Modification to
Part 70 Permit No.: T049-9015-00018

Dear Mr. Graham:

Topp Industries, Inc. was issued a Part 70 permit on May 31, 2001, for the operation of a 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 April 2, 2007. Pursuant to the provisions of 326 IAC 2-7-10.5, a significant source modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification includes the addition of one (1) non-atomized mechanical resin application unit. The applicator will be added to an existing resin application area and will bring the total number of units in the resin application area to eight (8).

The following construction conditions shall apply:

- General Construction Conditions
1. 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.
- Effective Date of the Permit
3. 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 one (1) non-atomized mechanical resin application unit as described above. Operating conditions shall be incorporated into the Part 70 Operating Permit Renewal in accordance with 326 IAC 2-7-8. Operation is not approved until the Part 70 Operating Permit Renewal 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, call (800) 451-6027 and ask for David Matousek at extension 4-5174 or dial (317) 234-5174.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

DJM/djm

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



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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Topp Industries, Inc.
420 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.

Third Significant Source Modification No.: T049-24550-00018	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 6, 2007

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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.

Source Address:	420 Highway 25 North, Rochester, Indiana 46975
Mailing Address:	P.O. Box 420, Rochester, Indiana 46975
General Source Phone Number:	(574) 233 - 3681
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; and Not 1 of 28 Source Categories

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

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, constructed in 1992 and modified in 2004 and 2007, consisting of eight (8) non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), with dry filters for control, each coating a maximum of 60.18 plastic tank mold units per hour, for a combined maximum capacity of 481.44 plastic tank mold units per hour and exhausting to one of the following stacks: V2, V3, V4, V5 or V7. The resin application units are portable and can be located in one of the following:
 - (1) Two (2) application booths, constructed in 1992 and modified in 2007, with dry filters for particulate matter (PM) control provided in each stack, each booth exhausts to one (1) of 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) control provided in each stack, exhausting to three (3) stacks (ID Nos. V4, V5 and V7).

Under the NESHAP, 40 CFR 63, Subpart WWWW, the resin application area, consisting of two (2) application booths and one (1) winding room, is considered an existing affected source.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (h) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. There 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].
- (i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (j) Other categories with emissions below insignificant thresholds:
 - (1) Plumbing Department - use of PVC glues with single HAP emissions less than 1 ton per year, total HAP emissions less than 2.5 tons per year and VOC emissions less than 3 pounds per hour or 15 pounds per day.
- (k) A plastic injection molding unit, heated by a natural gas burner rated at 1.0 MMBtu per hour.

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 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, 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, constructed in 1992 and modified in 2004 and 2007, consisting of eight (8) non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), with dry filters for control, each coating a maximum of 60.18 plastic tank mold units per hour, for a combined maximum capacity of 481.44 plastic tank mold units per hour and exhausting to one of the following stacks: V2, V3, V4, V5 or V7. The resin application units are portable and can be located in one of the following:
 - (1) Two (2) application booths, constructed in 1992 and modified in 2007, with dry filters for particulate matter (PM) control provided in each stack, each booth exhausts to one (1) of 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) control provided in each stack, exhausting to three (3) stacks (ID Nos. V4, V5 and V7).

Under the NESHAP, 40 CFR 63, Subpart WWWW, the resin application area, consisting of two (2) application booths and one (1) winding room, is considered an existing affected source.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit 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.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emissions Limitation and Standards

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the BACT determination under 326 IAC 8-1-6 in T049-9015-00018, issued on May 31, 2001, 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 not exceed 99 tons per twelve (12) consecutive months with compliance determined at the end of each month.
 - (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.1.10 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.

- (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 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.1.5 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.1.6 Operator Training for Reinforced Plastics Composites Fabrication [326 IAC 20-56-2]

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

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
- (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.1.7 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 any control devices.

Compliance Determination Requirements

D.1.8 VOC Emissions

Compliance with Condition D.1.4 (a) 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.1.12.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Compliance with the limit in Condition D.1.4 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: Unified Emission Factors for Open Molding of Composites, Composites Fabricators Association, July 30, 2001, 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.1.13 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.

Note: Compliance with the monomer content limits in Condition D.1.4 (b) 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.

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, 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.

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.

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

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the cutting and grinding area stack exhaust, known as V1, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances

shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4 (a), 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 Condition D.1.4:
- (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) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.17. 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.1.12, the Permittee shall maintain a daily record of visible emission notations of the cutting and grinding area stack exhaust, known as stack V1. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary to document compliance with Condition D.1.4 (a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Since the uncontrolled potential to emit VOC is less than 99 tons per year, compliance with Condition D.1.4 (a) can be achieved by using a resin with a monomer content of 35% or less. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-(1)]

D.1.14 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.1.15 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 an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

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

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in 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.

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

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

[As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:]

If your operation 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.

⁴ 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 following 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

¹Organic 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.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Table 5 to Subpart WWWW of Part 63—Alternative Organic HAP Emissions Limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations Where the Standard is 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 ...	b. Manual resin application ...	8 lb/ton.

¹Organic 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 content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:]

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 atomized mechanical	45.9

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.	<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 average 1 year after the appropriate compliance date, and/or</p> <p>ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or</p> <p>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.</p>

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 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).
	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)).

Table 15 to Subpart WWWW of Part 63.--Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63
[As specified in §63.5925, the parts of the General Provisions which apply to you are shown in the following table:]

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
Sec. 63.1(a)(1).....	General applicability of the general provisions.	Yes.....	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
Sec. 63.1(a)(2) through (4).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(a)(5).....	Reserved.....	No.....	
Sec. 63.1(a)(6).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(a)(7) through (9).....	Reserved.....	No.....	
Sec. 63.1(a)(10) through (14).....	General applicability of the general provisions.	Yes.....	
Sec. 63.1(b)(1).....	Initial applicability determination.	Yes.....	Subpart WWWW of Part 63 clarifies the applicability in Sec. 63.5780 and 63.5785.
Sec. 63.1(b)(2).....	Reserved.....	No.....	
Sec. 63.1(b)(3).....	Record of the applicability determination.	Yes.....	
Sec. 63.1(c)(1).....	Applicability of this part after a relevant standard has been set under this part.	Yes.....	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
Sec. 63.1(c)(2).....	Title V operating	Yes.....	All major affected

		permit requirement.		sources are required
			And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
The general provisions reference . . .		That addresses . . .		
Sec. 63.1(c)(3) and (4).....	Reserved.....	No.....		to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
Sec. 63.1(c)(5).....	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes.....		
Sec. 63.1(d).....	Reserved.....	No.....		
Sec. 63.1(e).....	Applicability of permit program before a relevant standard has been set under this part.	Yes.....		
Sec. 63.2.....	Definitions.....	Yes.....		Subpart WWWW of Part 63 defines terms in Sec. 63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
Sec. 63.3.....	Units and abbreviations	Yes.....		Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
Sec. 63.4.....	Prohibited activities and circumvention.	Yes.....		Sec. 63.4(a)(3) through (5) is

			reserved and does not

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .

Sec. 63.5(a)(1) and (2).....	Applicability of construction and reconstruction.	Yes.....	apply. Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(1).....	Relevant standards for new sources upon construction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(2).....	Reserved.....	No.....	
Sec. 63.5(b)(3).....	New construction/reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(4).....	Construction/reconstruction notification.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(b)(5).....	Reserved.....	No.....	
Sec. 63.5(b)(6).....	Equipment addition or process change.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(c).....	Reserved.....	No.....	
Sec. 63.5(d)(1).....	General application for approval of construction or reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5(d)(2).....	Application for approval of construction.	Yes.....	
Sec. 63.5(d)(3).....	Application for	No.....	

Sec.	63.6(d).....	Reserved.....	No.....	
				Subject to the following additional information . . .
The general provisions reference . . .		That addresses . . .	And applies to subpart WWWW of part 63 . . .	
Sec.	63.6(e)(1) and (2).....	Operation & maintenance requirements.	Yes.....	
Sec.	63.6(e)(3).....	Startup, shutdown, and malfunction plan and recordkeeping.	Yes.....	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
Sec.	63.6(f)(1).....	Compliance except during periods of startup, shutdown, and malfunction.	No.....	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
Sec.	63.6(f)(2) and (3).....	Methods for determining compliance.	Yes.....	
Sec.	63.6(g)(1) through (3).....	Alternative standard...	Yes.....	
Sec.	63.6(h).....	Opacity and visible emission Standards.	No.....	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec.	63.6(i)(1) through (14).....	Compliance extensions..	Yes.....	
Sec.	63.6(i)(15).....	Reserved.....	No.....	
Sec.	63.6(i)(16).....	Compliance extensions..	Yes.....	
Sec.	63.6(j).....	Presidential compliance exemption.	Yes.....	
Sec.	63.7(a)(1).....	Applicability of performance testing requirements.	Yes.....	
Sec.	63.7(a)(2).....	Performance test dates.	No.....	Subpart WWWW of Part 63 initial compliance requirements are in Sec. 63.5840.
Sec.	63.7(a)(3).....	CAA Section 114	Yes.....	

authority.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of part 63 . . .	Subject to the following additional information . . .

Sec. 63.7(b)(1).....	Notification of performance test.	Yes.....	
Sec. 63.7(b)(2).....	Notification rescheduled performance test.	Yes.....	
Sec. 63.7(c).....	Quality assurance program, including test plan.	Yes.....	Except that the test plan must be submitted with the notification of the performance test.
Sec. 63.7(d).....	Performance testing facilities.	Yes.....	
Sec. 63.7(e).....	Conditions for conducting performance tests.	Yes.....	Performance test requirements are contained in Sec. 63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in Sec. 63.5870.
Sec. 63.7(f).....	Use of alternative test method.	Yes.....	
Sec. 63.7(g).....	Performance test data analysis, recordkeeping, and reporting.	Yes.....	
Sec. 63.7(h).....	Waiver of performance tests.	Yes.....	
Sec. 63.8(a)(1) and (2).....	Applicability of monitoring requirements.	Yes.....	
Sec. 63.8(a)(3).....	Reserved.....	No.....	
Sec. 63.8(a)(4).....	Monitoring requirements when using flares.	Yes.....	
Sec. 63.8(b)(1).....	Conduct of monitoring exceptions.	Yes.....	

Sec.	63.8(b)(2) and (3).....	Multiple effluents and	Yes.....	
				Subject to the following additional information . . .
The general provisions reference . . .		That addresses . . .	And applies to subpart WWWW of part 63 . . .	
Sec.	63.8(c)(1).....	multiple monitoring systems. Compliance with CMS operation and maintenance requirements.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec.	63.8(c)(2) and (3).....	Monitoring system installation.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec.	63.8(c)(4).....	CMS requirements.....	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec.	63.8(c)(5).....	Continuous Opacity Monitoring System (COMS) minimum procedures.	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
Sec.	63.8(c)(6) through (8).....	CMS calibration and periods CMS is out of control.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec.	63.8(d).....	CMS quality control program, including test plan and all previous versions.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec.	63.8(e)(1).....	Performance evaluation of CMS.	Yes.....	This section applies if you elect to use a CMS

			to demonstrate
			Subject to the following additional information . . .
The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	
Sec. 63.8(e)(2).....	Notification of performance evaluation.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(3) and (4).....	CMS requirements/alternatives.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(5)(i).....	Reporting performance evaluation results.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8(e)(5)(ii).....	Results of COMS performance evaluation.	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.8(f)(1) through (3).....	Use of an alternative monitoring method.	Yes.....	
Sec. 63.8(f)(4).....	Request to use an alternative monitoring method.	Yes.....	
Sec. 63.8(f)(5).....	Approval of request to use an alternative monitoring method.	Yes.....	
Sec. 63.8(f)(6).....	Request for alternative to relative accuracy test and associated records.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

Sec. 63.8(g)(1) through (5).....	Data reduction.....	Yes.....	Subject to the following additional information . . .
The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
Sec. 63.9(a)(1) through (4).....	Notification requirements and general information.	Yes.....	
Sec. 63.9(b)(1).....	Initial notification applicability.	Yes.....	
Sec. 63.9(b)(2).....	Notification for affected source with initial startup before effective date of standard.	Yes.....	
Sec. 63.9(b)(3).....	Reserved.....	No.....	
Sec. 63.9(b)(4)(i).....	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes.....	
Sec. 63.9(b)(4)(ii) through (iv)...	Reserved.....	No.....	
Sec. 63.9(b)(4)(v).....	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.9(b)(5).....	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.

effective date and for

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
	which an application for approval of construction or reconstruction is not required.		
Sec. 63.9(c).....	Request for compliance extension.	Yes.....	
Sec. 63.9(d).....	Notification of special compliance requirements for new source.	Yes.....	
Sec. 63.9(e).....	Notification of performance test.	Yes.....	
Sec. 63.9(f).....	Notification of opacity and visible emissions observations.	No.....	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.9(g)(1).....	Additional notification requirements for sources using CMS.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9(g)(2).....	Notification of compliance with opacity emission standard.	No.....	Subpart WWWW of Part 63 does not contain opacity emission standards.
Sec. 63.9(g)(3).....	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9(h)(1) through (3).....	Notification of compliance status.	Yes.....	
Sec. 63.9(h)(4).....	Reserved.....	No.....	
Sec. 63.9(h)(5) and (6).....	Notification of compliance status.	Yes.....	

Sec.		Adjustment of submittal	Yes.....	
				Subject to the following additional information . . .
The general provisions reference . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .		
Sec. 63.9(i).....	Adjustment of submittal	Yes.....		
Sec. 63.9(j).....	Change in information provided.	Yes.....		
Sec. 63.10(a).....	Applicability of recordkeeping and reporting.	Yes.....		
Sec. 63.10(b)(1).....	Records retention.....	Yes.....		
Sec. 63.10(b)(2)(i) through (v)....	Records related to startup, shutdown, and malfunction.	Yes.....		Only applies to facilities that use an add-on control device.
Sec. 63.10(b)(2)(vi) through (xi)..	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations.	Yes.....		
Sec. 63.10(b)(2)(xii).....	Record of waiver of recordkeeping and reporting.	Yes.....		
Sec. 63.10(b)(2)(xiii).....	Record for alternative to the relative accuracy test.	Yes.....		
Sec. 63.10(b)(2)(xiv).....	Records supporting initial notification and notification of compliance status.	Yes.....		
Sec. 63.10(b)(3).....	Records for applicability determinations.	Yes.....		
Sec. 63.10(c)(1).....	CMS records.....	Yes.....		This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission

			limit.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .

Sec. 63.10(c)(2) through (4).....	Reserved.....	No.....	
Sec. 63.10(c)(5) through (8).....	CMS records.....	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10(c)(9).....	Reserved.....	No.....	
Sec. 63.10(c)(10) through (15).....	CMS records.....	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10(d)(1).....	General reporting requirements.	Yes.....	
Sec. 63.10(d)(2).....	Report of performance test results.	Yes.....	
Sec. 63.10(d)(3).....	Reporting results of opacity or visible emission observations.	No.....	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.10(d)(4).....	Progress reports as part of extension of compliance.	Yes.....	
Sec. 63.10(d)(5).....	Startup, shutdown, and malfunction reports.	Yes.....	Only applies if you use an add-on control device.
Sec. 63.10(e)(1) through (3).....	Additional reporting requirements for CMS.	Yes.....	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
Sec. 63.10(e)(4).....	Reporting COMS data....	No.....	Subpart WWWW of Part 63 does not contain opacity standards.

Sec.	63.10(f)	Waiver for	Yes	

	The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of part 63 . . .	Subject to the following additional information . . .

Sec.	63.11	recordkeeping or reporting. Control device requirements.	Yes	Only applies if you elect to use a flare as a control device.
Sec.	63.12	State authority and delegations.	Yes	
Sec.	63.13	Addresses of State air pollution control agencies and EPA Regional Offices.	Yes	
Sec.	63.14	Incorporations by reference.	Yes	
Sec.	63.15	Availability of information and confidentiality.	Yes	

D.1.16 One Time Deadlines Relating to NESHAP WWWW

- (a) Pursuant to 40 CFR 63.5905, the Permittee must submit an initial notification by November 2001 and initial statement of compliance on March 1, 2002.
- (b) The Permittee must conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
- (c) The Permittee must submit a notification of compliance status no later than the dates specified in §63.9(b)(2) following the completion of the compliance demonstration.
- (d) Pursuant to 40 CFR §63.9(b)(4)(i) for the fluid impingement device to be constructed in 2007, the Permittee must submit a notification to the Administrator of the intent to reconstruct a major-emitting affected source as specified in 40 CFR §63.5(d)(1)(i).
- (e) Pursuant to 40 CFR §63.9(b)(4)(v) for the fluid impingement device to be constructed in 2007, the Permittee must submit a notification to the Administrator of the actual date of startup, delivered or postmarked within fifteen (15) calendar days after that date.

D.1.17 State only Reinforced Plastic Composites Production 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.1.15 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.

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

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 Streams [As required in Sec. 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) ^{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 Sec. Sec. 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 Sections. 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.

The requirements of 326 IAC 20-56 listed in this condition are not federally enforceable.

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

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

Source Background and Description

Source Name:	Topp Industries, Inc.
Source Location:	420 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.:	T049-24550-00018
Operation Permit Renewal No.:	T049-24588-00018
Permit Reviewer:	David J. Matousek

The Office of Air Quality (OAQ) has reviewed a Part 70 operating permit renewal and a significant source modification application from Topp Industries, Inc., relating to the operation of a fiberglass reinforced plastics tank and related sewer parts manufacturing operation.

Source History

The Office of Air Quality (OAQ) received an application for a Part 70 operating permit renewal on September 2, 2005. On April 2, 2007, the OAQ received an application for a significant permit modification and a source modification to the existing Part 70 operating permit T049-9015-00018, issued on May 31, 2001. The source and permit modification application involved the addition of one (1) non-atomized mechanical resin application unit. The addition of the non-atomized mechanical resin application unit increased the total number of units at the source from seven (7) applicators to eight (8) applicators.

Description of Proposed Modification

The proposed modification to the source includes the construction of one (1) non-atomized mechanical resin application unit in the fiberglass reinforced plastic (FRP) production process (ID No. EU-01). With the additional resin applicator, the resin application area will consist of the following:

- One (1) resin application area, constructed in 1992 and modified in 2004 and 2007, consisting of eight (8) non-atomized mechanical resin application unit (flow coater, flow chopper and/or fluid impingement device), with dry filters for control, each coating a maximum of 60.18 plastic tank mold units per hour, for a combined maximum capacity of 481.44 plastic tank mold units per hour and exhausting to one of the following stacks: V2, V3, V4, V5 or V7. The resin application unit is portable and can be located in one of the following:
- (1) Two (2) application booths constructed in 1992 and modified in 2007, with dry filters for particulate matter (PM) control provided in each stack, each booth exhausts to one (1) of 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) control provided in each stack, exhausting to three (3) stacks (ID Nos. V4, V5 and V7).

Permitted Emission Units and Pollution Control Equipment

The existing source, as described in Part 70 permit No. T049-9015-00018, Section A.2 and A.3, consists of the following permitted emission units and pollution control devices:

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 capacity 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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

- (h) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. There 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].
- (i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (j) Other categories with emissions below insignificant thresholds:
 - (1) Plumbing Department - use of PVC glues with single HAP emissions less than 1 ton per year, total HAP emissions less than 2.5 tons per year and VOC emissions less than 3 pounds per hour or 15 pounds per day.
- (k) A plastic injection molding unit, heated by a natural gas burner rated at 1.0 MMBtu per hour.

Proposed Source Modification

After the proposed modification, the source will consist of the following emission units, deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- 1.) Section A.2, of Part 70 Operating Permit No. T049-9015-00018, has been modified to reflect the addition of fluid impingement device number eight (8).

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

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, **constructed in 1992 and modified in 2004 and 2007**, consisting of ~~seven (7)~~ **eight (8)** non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), **with dry filters for control**, each coating a maximum of 60.18 plastic tank mold units per hour, for a ~~total~~ **combined maximum capacity of 424.3 481.44** plastic tank mold units per hour **and exhausting to one of the following stacks: V2, V3, V4, V5 or V7**. The ~~spray~~ resin application units are **portable and can be located in one of the following**:
 - (1) ~~Two (2) spray-application~~ **Two (2) spray-application** booths, constructed in 1992 **and modified in 2007**, with dry filters for particulate matter (PM) ~~overspray~~ control **provided in each stack, each booth exhausts to one (1) of** ~~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 **provided in each stack, exhausting at to three (3) stacks (ID Nos. V4, V5 and V7).**

Under the NESHAP, 40 CFR 63, Subpart WWWW, the resin application area, consisting of two (2) application booths and one (1) winding room, is considered an existing affected source.

- 2) The facility description, in Section D.1 of Part 70 Operating Permit No. T049-9015-00018, has been modified to include the construction of fluid impingement device number eight (8).

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, **constructed in 1992 and modified in 2004 and 2007**, consisting of ~~seven (7)~~ **eight (8)** non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), **with dry filters for control**, each coating a maximum of 60.18 plastic tank mold units per hour, for a ~~total~~ **combined maximum capacity of 424.3 481.44** plastic tank mold units per hour **and exhausting to one of the following stacks: V2, V3, V4, V5 or V7**. The ~~spray resin~~ application units are **portable and can be located in one of the following**:
- (1) ~~Two (2) spray application~~ booths, constructed in 1992 **and modified in 2007**, with dry filters for particulate matter (PM) ~~overspray~~ control **provided in each stack, each booth exhausts to one (1) of** ~~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 **provided in each stack**, exhausting ~~at~~ to three (3) stacks (ID Nos. V4, V5 and V7).

Under the NESHAP, 40 CFR 63, Subpart WWWW, the resin application area, consisting of two (2) application booths and one (1) winding room, is considered an existing affected source.

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

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (h) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. There 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].
- (i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (j) Other categories with emissions below insignificant thresholds:
 - (1) Plumbing Department - use of PVC glues with single HAP emissions less than 1 ton per year, total HAP emissions less than 2.5 tons per year and VOC emissions less than 3 pounds per hour or 15 pounds per day.
- (k) A plastic injection molding unit, heated by a natural gas burner rated at 1.0 MMBtu per hour.

Existing Approvals

The source was issued a Part 70 operating permit No. T049-9015-00018, on May 31, 2001. The source has since received the following:

- (a) First administrative amendment No. 049-14806-00018 issued on September 19, 2001;
- (b) Second administrative amendment No. 049-17294-00018 issued on September 18, 2003;
- (c) First significant source modification No. 049-20354-00018 issued on March 04, 2005;
- (d) First significant permit modification No. 049-19887-00018 issued on March 21, 2005;
- (e) Third administrative amendment No. 049-20776-00018 issued on April 15, 2005;
- (f) Second significant source modification No. 049-21788-00018 issued on January 23, 2006; and
- (g) Second significant permit modification No. 049-21798-00018 issued on February 8, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

- 1) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
- 2) An application for the purposes of review for the Part 70 renewal was received on September 2, 2005. An application for the purposes of review for the Part 70 source and permit modifications was received on April 2, 2007.

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

- 1) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
- 2) An application for the purposes of review for the Part 70 renewal was received on September 2, 2005. An application for the purposes of review for the Part 70 source and permit modifications was received on April 2, 2007.

Emission Calculations

See Appendix A, pages 1 through 7, of this document for detailed emission calculations.

Potential to Emit of the Source

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

The following table shows the potential to emit change of the modified process due to construction of non-atomized mechanical resin application unit number eight (8).

PTE Change of the Modified Process After Controls			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Net Difference (ton/yr)
PM	0.11	0.11	0.00
PM ₁₀	0.07	0.07	0.00
SO ₂	0.00	0.00	0.00
VOC	73.28	83.67	10.39
CO	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
Single HAP	71.00	81.15	10.15
Total HAPs	71.01	81.17	10.16

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)), after modification, of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.
- (c) Permit Level Determination - Part 70
 The source modification, submitted under permit application number 049-24550-00018, is subject to 326 IAC 2-7-10.5(f)(6), since the potential to emit of the modification is greater than or equal to ten (10) tons per year of a single hazardous air pollutant, as defined under Section 112(b) of the Clean Air Act (CAA). Additionally, the source modification will be incorporated into the Part 70 Operating Permit through the Part 70 Operating Permit Renewal, No. T049-24588-00018.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	1.0
PM-10	1.0
SO ₂	---
VOC	14.0
CO	---
NO _x	---
HAP	---

“---“ No emissions data reported.

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for PSD, 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fulton County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (d) 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. See the State Rule Applicability for the source section.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) 40 CFR 64 – Compliance Assurance Monitoring:

This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:

- (1) With the potential to emit before controls equal to or greater than the major source threshold;
- (2) That is subject to an emission limitation or standard; and
- (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The resin application area, consisting of the application booths and winding room, have add-on controls for particulate matter control. However, the uncontrolled potential to emit of these units does not exceed the major source threshold. Moreover, the fiberglass reinforced plastic (FRP) tank production process is 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.

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
resin application area - VOC	N	Y	83.67	83.67	100	N	N
resin application area - PM/PM10	Y	N	6.81 / 4.51	0.11 / 0.07	100	N	N
resin application area - Single HAP	N	N	81.15	81.15	10	N	N
resin application area - Total HAPs	N	N	81.17	81.17	25	N	N

(b) 40 CFR 63, Subpart WWWW – Standards for Reinforced Plastic Composites Production:

This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Therefore, the requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63.5780, Subpart WWWW are included in the permit. Construction of this source commenced prior to August 2, 2001. Therefore, this is an existing affected source.

The processes at this source subject to the rule include open molding, manual resin application, and 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:

- (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, constructed in 1992 and modified in 2004 and 2007, consisting of eight (8) non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), with dry filters for control, each coating a maximum of 60.18 plastic tank mold units per hour, for a combined maximum capacity of

481.44 plastic tank mold units per hour and exhausting to one of the following stacks: V2, V3, V4, V5 or V7. The resin application units are portable and can be located in one of the following:

- (1) Two (2) application booths, constructed in 1992 and modified in 2007, with dry filters for particulate matter (PM) control provided in each stack, each booth exhausts to one (1) of 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) control provided in each stack, exhausting to three (3) stacks (ID Nos. V4, V5 and V7).

Under the NESHAP, 40 CFR 63, Subpart WWWW, the resin application area, consisting of two (2) application booths and one (1) winding room, is considered an existing affected source.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of 40 CFR 63, 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

State Rule Applicability – Entire Source

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

This source has potential emissions of PM, PM-10, SO₂, NO_x, VOC and CO of less than 250 tons per year before and after this modification. Therefore, this source is not subject to the requirements of 326 IAC 2-2 and remains a minor source under this rule.

326 IAC 2-4.1 (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) (40 CFR 63, Subpart WWWW), the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted annually if the potential to emit of VOC is greater than 250 tons per year, otherwise the emission statement needs to be submitted triennially. For this source, the source wide emission of VOC is limited to less than 250 tons per year. Therefore in accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

Pursuant to 326 IAC 20-25-1(d), a source that is subject to 326 IAC 20-56 is exempt from this rule after April 21, 2006, for a source that existed on or before August 2, 2001. Therefore, since this source is subject to 326 IAC 20-56 and existed before August 2, 2001, it is exempt from 326 IAC 20-25.

326 IAC 20-56 (Reinforced Plastic Composites Production)

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

On August 25, 2005, US EPA issued revisions to 40 CFR 63, Subpart WWWW as published in the Federal Register of August 25, 2005 and became effective on October 24, 2005. The revisions to the NESHAP have not yet been approved into the Indiana State Implementation Plan (SIP). Hence, in order to be in compliance with this rule, the source has to comply with the version of 40 CFR 63, Subpart WWWW that existed prior to the revised rule published in the Federal Register on August 25, 2005. Therefore, a condition has been added to the Part 70 Operating Permit and includes the following revised conditions applicable to the source:

- (1) 40 CFR 63.5805(b)
- (2) 40 CFR 63.5810(a), (b) and (d)
- (3) 40 CFR 63.5895(d)
- (4) 40 CFR 63.5900(a) (2), (3)
- (5) 40 CFR 63.5935

When the revised rule is incorporated into the SIP, the Permittee may apply for a modification 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.

There are also changes in Tables 1, 3, 4, 7, 8 and 9 that revise the requirements of the rule for this source. See the Federal Rule Applicability section of this document for information regarding 40 CFR Part 63, Subpart WWWW.

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

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

State Rule Applicability – Individual Facilities

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

- (a) The eight (8) non-atomized mechanical resin application units are not subject to this rule because PM emissions from these facilities are negligible.
- (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 1.55 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.

- (c) Pursuant to 326 IAC 6-3-2(d), particulate from the resin application area shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-1 (VOC – Surface Coating Emission Limitations)

This rule does not apply to the source because the production of reinforced plastic products is not specifically listed under this rule.

326 IAC 8-1-6 (New facilities: general reduction requirements)

The FRP tank production process, including the resin application area, is subject to the requirements of this rule. The version of 326 IAC 8-1-6, in effect at the time of construction of the source, applied to new facilities (as of January 1, 1980) that:

- (1) had potential emissions of twenty-five (25) tons or more per year of VOC;
- (2) were located anywhere in the state; and
- (3) were not otherwise regulated by article 8.

The current version of 326 IAC 8-1-6, effective June 24, 2006, provides an exemption for facilities regulated under 326 IAC 20-48 and 326 IAC 20-56. Since this source was constructed prior to the exemption, 326 IAC 8-1-6 applies.

Pursuant to this rule, VOC emissions from these facilities shall be reduced using best available control technology (BACT). Pursuant to the BACT determination under 326 IAC 8-1-6 in T049-9015-00018, issued on May 31, 2001, 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 with compliance determined at the end of each month.
- (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.1.5 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 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, 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 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.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the

requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The cutting, and grinding operations have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the cutting and grinding area stack exhaust known as V1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the cutting and grinding area must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The construction of non-atomized mechanical resin application unit number eight (8), with a maximum capacity of 60.18 plastic mold units per hour, is included in the approval of Significant Source Modification No. 049-24550-00018.

The construction and operation of this fiberglass reinforced plastics tank and related sewer parts manufacturing operation shall be subject to the conditions of the attached proposed Significant Source Modification No. 049-24550-00018 and Part 70 Permit Renewal No. T049-24588-00018.

Appendix A: Emission Calculations Summary

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Part 70 Operating Permit Renewal Number: 049-24588-00018
Third Significant Source Modification Number: 049-24550-00018
Plant ID No.: 049-00018
Reviewer: David J. Matousek
Date: September 6, 2007

Potential to Emit of the Source Prior to Source Modification and Prior to Emission Control (tons per year)				
Emissions Generating Activity				
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	TOTAL
PM	0.00	0.01	6.80	6.81
PM10	0.00	0.01	4.50	4.51
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	71.62	1.66	0.00	73.28
CO	0.00	0.00	0.00	0.00
total HAPs	71.00	0.01	0.00	71.01
worst case single HAP	71 (Styrene)	0.01 (Toluene)	0.00	71.00 (Styrene)

Total emissions based on rated capacity at 8,760 hours/year.

* PM and PM-10 emissions from cutting/grinding are based on emissions provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.

Potential to Emit of the Source After Source Modification and Prior to Controls (tons per year)				
Emissions Generating Activity				
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	TOTAL
PM	0.00	0.01	6.80	6.81
PM10	0.00	0.01	4.50	4.51
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	81.86	1.81	0.00	83.67
CO	0.00	0.00	0.00	0.00
total HAPs	81.15	0.02	0.00	81.17
worst case single HAP	81.15 (Styrene)	0.02 (Toluene)	0.00	81.15 (Styrene)

Total emissions based on rated capacity at 8,760 hours/year.

* PM and PM-10 emissions from cutting/grinding are based on emissions provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.

Potential to Emit of the Source After Source Modification and After Controls (tons per year)				
Emissions Generating Activity				
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	TOTAL
PM	0.00	0.01	0.10	0.11
PM10	0.00	0.01	0.06	0.07
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	81.86	1.81	0.00	83.67
CO	0.00	0.00	0.00	0.00
total HAPs	81.15	0.02	0.00	81.17
worst case single HAP	81.15 (Styrene)	0.02 (Toluene)	0.00	81.15 (Styrene)

Total emissions based on rated capacity at 8,760 hours/year, after control.

* PM and PM-10 emissions from cutting/grinding are based on emissions provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations* - Prior to Source Modification
Resin, Gel and Catalyst Usage

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Part 70 Operating Permit Renewal Number: 049-24588-00018
Third Significant Source Modification Number: 049-24550-00018
Plt ID: 049-00018
Reviewer: David J. Matousek
Date: September 6, 2007

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Spray Unit #1	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #2	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #3	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #4	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #5	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #6	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #7	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Catalyst Usage	Norox MEKP-9	9.17	0.02	0.0019	421.26	N/A	3.52	0.64	100%	0.00
Total VOC/HAP and PM from Resin and Gel Use								71.62		0.00

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

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

METHODOLOGY

Assume all of the monomer is styrene.

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

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gel coat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 24 hrs/day * 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Potential VOC pounds per hour (Norox MEKP-9) = Tons Processed per hour (ton/hr) * (Weight % Styrene) * 2000 lb/ton

Note: Only 2% of the catalyst is volatile. The rest is reacted or incorporated in the final product.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations* - After Source Modification
Resin, Gel and Catalyst Usage

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Part 70 Operating Permit Renewal Number: 049-24588-00018
Third Significant Source Modification Number: 049-24550-00018
Plt ID: 049-00018
Reviewer: David J. Matousek
Date: September 6, 2007

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Spray Unit #1	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #2	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #3	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #4	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #5	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #6	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #7	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Spray Unit #8	Resin H-834-QAC or RLC	9.17	0.35	0.109	60.18	77	55.58	10.14	100%	0.00
Catalyst Usage	Norox MEKP-9	9.17	0.02	0.0019	481.44	N/A	4.03	0.74	100%	0.00
Total VOC/HAP and PM from Resin and Gel Use								81.86		0.00

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

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

METHODOLOGY

Assume all of the monomer is styrene.

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

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gel coat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 24 hrs/day * 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Potential VOC pounds per hour (Norox MEKP-9) = Tons Processed per hour (ton/hr) * (Weight % Styrene) * 2000 lb/ton

Note: Only 2% of the catalyst is volatile. The rest is reacted or incorporated in the final product.

Appendix A: Emission Calculations
HAP Emission Calculations - Prior to Source Modification

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Part 70 Operating Permit Renewal Number: 049-24588-00018
Third Significant Source Modification Number: 049-24550-00018
Plt ID: 049-00018
Permit Reviewer: David J. Matousek
Date: September 6, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Styrene or UEF	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Toluene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Fiberglass Processing															
H-834-QAC or RLC	9.17	0.109000	421.26	0.00%	77.00	0.00%	0.00%	0.00%	0.00%	0.00	71.00	0.00	0.00	0.00	0.00
Norox MEKP-9	9.17	0.001900	421.26	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating															
DiamondKote	8.34	0.000007	421.26	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Super Blue	8.87	0.240000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Shipshape	9.01	0.000060	421.26	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Dem-Kote Gloss Black	7.50	0.000008	421.26	12.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

0.01 71.00 0.00 0.00 0.00 0.00

Total HAPs

71.01

METHODOLOGY

HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAPS emission rate by UEF for Styrene (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * ton resin/2000 lb resin * UEF (lb Styrene/ton resin) * 8760 hrs/yr * 1 ton Styrene /2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations - After Source Modification

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Part 70 Operating Permit Renewal Number: 049-24588-00018
Third Significant Source Modification Number: 049-24550-00018
Plt ID: 049-00018
Permit Reviewer: David J. Matousek
Date: September 6, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Styrene or UEF	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Toluene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Fiberglass Processing															
H-834-QAC or RLC	9.17	0.109000	481.44	0.00%	77.00	0.00%	0.00%	0.00%	0.00%	0.00	81.15	0.00	0.00	0.00	0.00
Norox MEKP-9	9.17	0.001900	481.44	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating															
DiamondKote	8.34	0.000007	481.44	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Super Blue	8.87	0.240000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Shipshape	9.01	0.000060	481.44	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Dem-Kote Gloss Black	7.50	0.000008	481.44	12.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

0.02 81.15 0.00 0.00 0.00 0.00

Total HAPs

81.17

METHODOLOGY

HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAPS emission rate by UEF for Styrene (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * ton resin/2000 lb resin * UEF (lb Styrene/ton resin) * 8760 hrs/yr * 1 ton Styrene /2000 lbs