



*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: December 26, 2007

RE: Interplastic Corporation - Molding Products Division / 141-24622-00091

FROM: Matthew Stuckey, Deputy Branch 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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Interplastic Corporation/Molding Products Division  
1545 South Olive Street  
South Bend, Indiana 46619**

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

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

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

Operation Permit No.: T141-24622-00091	
Issued by:  <i>Original signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 26, 2007  Expiration Date: December 26, 2012

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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)]

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The Permittee owns and operates a stationary sheet molding compound (SMC) manufacturing facility.

Source Address:	1545 South Olive Street, South Bend, Indiana 46619
Mailing Address:	1545 South Olive Street, South Bend, Indiana 46619
General Source Phone Number:	574-234-1105
SIC Code:	3087, 3089
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Six (6) SMC paste mixers identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and Tabletop Cowles mixer #6, with a maximum total production of 108,405 tons of SMC paste per year. The Particulate emissions from the six (6) mixers are controlled by one (1) baghouse.
- (b) Two (2) 48-inch sheet molding machines, identified as SMC machine #1 and SMC machine #2, with a maximum total throughput of 50,315 tons of sheet molding compound (SMC) per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in 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)]

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

- (a) Three (3) polyester resin storage/holding tanks, identified as Tank #6, Tank #7 and Tank #8, each with a capacity of 2,700 gallons.
- (b) One (1) polyester resin day tank/blending tank, with a capacity of 2,250 gallons.
- (c) One (1) 2A-side feed tank, with a capacity of 720 gallons.
- (d) One (1) 2B-side feed tank, with a capacity of 360 gallons.

- (e) Four (4) polyester resin storage/holding tanks, identified as Tank #12, Tank #13, Tank #14, and Tank #15, each with a capacity of 2,818 gallons.
- (f) One (1) 1A-side paste holding tank, with a capacity of 195 gallons.
- (g) One (1) 1B-side paste holding tank, with a capacity of 192 gallons.
- (h) One (1) SMC #2 holding tank/thickener tank, with a capacity of 195 gallon
- (i) Maturization room, with a capacity of 50,315 tons of SMC per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in an existing affected source.

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

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

- (a) This permit, T141-24622-00091, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.4 Enforceability [326 IAC 2-7-7]**

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T141-24622-00091 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

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

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

#### C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Six (6) SMC paste mixers identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and Tabletop Cowles mixer #6, with a maximum total production of 108,405 tons of SMC paste per year. The Particulate emissions from the six (6) mixers are controlled by one (1) baghouse.
- (b) Two (2) 48-inch sheet molding machines, identified as SMC machine #1 and SMC machine #2, with a maximum total throughput of 50,315 tons of sheet molding compound (SMC) per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in an existing affected source.

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

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

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the six (6) mixers, identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and tabletop Cowles mixer #6, when operating at a total process weight of 24,750 pounds per hour, the combined PM emissions shall not exceed 22.12 pounds per hour, based on the following equation:

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

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these facilities.

### Compliance Determination Requirements

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1), (6)]

In order to demonstrate compliance with Condition D.1.1, and within 180 days after the issuance of the Significant Permit Modification 141-21111-00091, dated March 22, 2007, the Permittee shall conduct PM testing of the uncontrolled six (6) SMC paste mixers utilizing methods as approved by the Commissioner.

Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

## SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) Six (6) SMC paste mixers, identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and Tabletop Cowles mixer #6, with a maximum total production of 108,405 tons of SMC paste per year. The Particulate emissions from the five mixers are controlled by one (1) baghouse.
- (b) Two (2) 48-inch sheet molding machines, identified as SMC machine #1 and SMC machine #2, with a maximum total throughput of 50,315 tons of sheet molding compound (SMC) per year.

#### Insignificant Activities:

- (a) Three (3) polyester resin storage/holding tanks, identified as Tank #6, Tank #7 and Tank #8, each with a capacity of 2,700 gallons.
- (b) One (1) polyester resin day tank/blending tank, with a capacity of 2,250 gallons.
- (c) One (1) 2A-side feed tank, with a capacity of 720 gallons.
- (d) One (1) 2B-side feed tank, with a capacity of 360 gallons.
- (e) Four (4) polyester resin storage/holding tanks, identified as Tank #12, Tank #13, Tank #14, and Tank #15, each with a capacity of 2,818 gallons.
- (f) One (1) 1A-side paste holding tank, with a capacity of 195 gallons.
- (g) One (1) 1B-side paste holding tank, with a capacity of 192 gallons.
- (h) One (1) SMC #2 holding tank/thickener tank, with a capacity of 195 gallon
- (i) Maturization room, with a capacity of 50,315 tons of SMC per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in an existing affected source.

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

#### E.1.1 General Provisions Relating to NESHAP 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 the schedule in 40 CFR 63, Subpart WWWW.

#### E.1.2 Reinforced Plastics Composites Production NESHAP [326 IAC 20-56] [40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW which is incorporated by reference as 326 IAC 20-56, as follows:

## **What This Subpart Covers**

### **§ 63.5780 What is the purpose of this subpart?**

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

### **§ 63.5785 Am I subject to this subpart?**

- (a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

### **§ 63.5790 What parts of my plant does this subpart cover?**

- (b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

### **§ 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?**

- (b) For the purposes of this subpart, an existing affected source is any affected source that is not new affected source.

### **§ 63.5797 How do I determine the organic HAP content of my resins and gel coats?**

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

- (a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
- (b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or

manufacturer, then you must use the measured organic HAP content to determine compliance.

- (c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

**§ 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?**

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in §63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in §63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

**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.

**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.

## **Testing and Initial Compliance Requirements**

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

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an 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. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their 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.

## **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.

### **§ 63.5915 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).

- (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 or equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

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

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

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

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

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

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

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

*Neat resin plus* means neat resin plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler,

reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

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

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

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

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

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

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

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

*Pigmented gel coat* means a gel coat that has a color, but does not contain 10 percent 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.

*White and off-white gel coat* means a gel coat that contains 10 percent of more titanium dioxide by weight.

**Table 2 to Subpart WWW 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:

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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.

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**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:

Table 4 to Subpart WWWW of Part 63\_Work Practice Standards

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.
4. an existing or new SMC manufacturing operation.	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation.	use a nylon containing film to enclose SMC.

**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:

Table 9 To Subpart WWWW of Part 63\_Initial Compliance With Work Practice Standards

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.

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4. an existing or new SMC  
manufacturing operation.

close or cover the  
resin delivery  
system to the  
doctor box on  
each SMC  
manufacturing  
machine. The  
doctor box itself  
may be open.

the owner or  
operator submits  
a certified  
statement in the  
notice of  
compliance status  
that the resin  
delivery system  
is closed or  
covered.

---

5. an existing or new SMC  
manufacturing operation.

use a nylon  
containing film  
to enclose SMC.

the owner or  
operator submits  
a certified  
statement in the  
notice of  
compliance status  
that a nylon-  
containing film  
is used to  
enclose SMC.

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**Table 13 to Subpart WWW 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).

**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 WWW of Part 63...	Subject to the following additional information...
§ 63.1(a)(1).....	General applicability of the general provisions.	Yes.....	Additional terms defined in subpart WWW of Part 63, when overlap between subparts A and WWW of Part 63 of this part, subpart WWW of Part 63 takes precedence.
§ 63.1(a)(2) through (4).....	General applicability of the general provisions.	Yes.....	
§ 63.1(a)(5).....	Reserved.....	No.....	
§ 63.1(a)(6).....	General applicability of the general provisions.	Yes.....	
§ 63.1(a)(7) through (9).....	Reserved.....	No.....	
§ 63.1(a)(10) through (14).....	General applicability of the general provisions.	Yes.....	
§ 63.1(b)(1).....	Initial applicability determination.	Yes.....	Subpart WWW of Part 63 clarifies the applicability in §§ 63.5780 and 63.5785.
§ 63.1(b)(2).....	Reserved.....	No.....	
§ 63.1(b)(3).....	Record of the applicability determination.	Yes.....	
§ 63.1(c)(1).....	Applicability of this	Yes.....	Subpart WWW of Part 63

	part after a relevant standard has been set under this part.		clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§ 63.1(c)(2).....	Title V operating permit requirement.	Yes.....	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§ 63.1(c)(3) and (4).....	Reserved.....	No.....	
§ 63.1(c)(5).....	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes.....	
§ 63.1(d).....	Reserved.....	No.....	
§ 63.1(e).....	Applicability of permit program before a relevant standard has been set under this part.	Yes.....	
§ 63.2.....	Definitions.....	Yes.....	Subpart WWWW of Part 63 defines terms in § 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.
§ 63.3.....	Units and abbreviations	Yes.....	Other units and abbreviations used in subpart WWWW of Part 63 are defined in

§ 63.4.....	Prohibited activities and circumvention.	Yes.....	subpart WWWW of Part 63. § 63.4(a)(3) through (5) is reserved and does not apply.
§ 63.5(a)(1) and (2).....	Applicability of construction and reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(1).....	Relevant standards for new sources upon construction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(2).....	Reserved.....	No.....	
§ 63.5(b)(3).....	New construction/reconstruction.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(4).....	Construction/reconstruction notification.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(5).....	Reserved.....	No.....	
§ 63.5(b)(6).....	Equipment addition or process change.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(c).....	Reserved.....	No.....	
§ 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.
§ 63.5(d)(2).....	Application for approval of construction.	Yes.....	

§ 63.5(d)(3).....	Application for approval of reconstruction.	No.....	
§ 63.5(d)(4).....	Additional information.	Yes.....	
§ 63.5(e)(1) through (5).....	Approval of construction or reconstruction.	Yes.....	
§ 63.5(f)(1) and (2).....	Approval of construction or reconstruction based on prior State preconstruction review.	Yes.....	
§ 63.6(a)(1).....	Applicability of compliance with standards and maintenance requirements.	Yes.....	
§ 63.6(a)(2).....	Applicability of area sources that increase HAP emissions to become major sources.	Yes.....	
§ 63.6(b)(1) through (5).....	Compliance dates for new and reconstructed sources.	Yes.....	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(b)(6).....	Reserved.....	No.....	
§ 63.6(b)(7).....	Compliance dates for new operations or equipment that cause an area source to become a major source.	Yes.....	New operations at an existing facility are not subject to new source standards.
§ 63.6(c)(1) and (2).....	Compliance dates for existing sources.	Yes.....	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(c)(3) and (4).....	Reserved.....	No.....	
§ 63.6(c)(5).....	Compliance dates for existing area sources that become major.	Yes.....	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(d).....	Reserved.....	No.....	
§ 63.6(e)(1) and (2).....	Operation &	Yes.....	

	maintenance requirements.		
§ 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.
§ 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.
§ 63.6(f)(2) and (3)	Methods for determining compliance.	Yes	
§ 63.6(g)(1) through (3)	Alternative standard...	Yes	
§ 63.6(h)	Opacity and visible emission Standards.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§ 63.6(i)(1) through (14)	Compliance extensions..	Yes	
§ 63.6(i)(15)	Reserved.....	No	
§ 63.6(i)(16)	Compliance extensions..	Yes	
§ 63.6(j)	Presidential compliance exemption.	Yes	
§ 63.7(a)(1)	Applicability of performance testing requirements.	Yes	
§ 63.7(a)(2)	Performance test dates.	No	Subpart WWWW of Part 63 initial compliance requirements are in § 63.5840.
§ 63.7(a)(3)	CAA Section 114 authority.	Yes	
§ 63.7(b)(1)	Notification of performance test.	Yes	
§ 63.7(b)(2)	Notification rescheduled	Yes	

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

§ 63.8(c)(2) and (3).....	Monitoring system installation.	Yes.....	limit. This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 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.
§ 63.8(c)(5).....	Continuous Opacity Monitoring System (COMS) minimum procedures.	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
§ 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.
§ 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.
§ 63.8(e)(1).....	Performance evaluation of CMS.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 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.
§ 63.8(e)(3) and (4).....	CMS requirements/	Yes.....	This section applies if

	alternatives.		you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 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.
§ 63.8(e)(5)(ii)	Results of COMS performance evaluation.	No	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.8(f)(1) through (3)	Use of an alternative monitoring method.	Yes	
§ 63.8(f)(4)	Request to use an alternative monitoring method.	Yes	
§ 63.8(f)(5)	Approval of request to use an alternative monitoring method.	Yes	
§ 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.
§ 63.8(g)(1) through (5)	Data reduction	Yes	
§ 63.9(a)(1) through (4)	Notification requirements and general information.	Yes	
§ 63.9(b)(1)	Initial notification applicability.	Yes	
§ 63.9(b)(2)	Notification for affected source with initial startup before effective date of standard.	Yes	
§ 63.9(b)(3)	Reserved	No	
§ 63.9(b)(4)(i)	Notification for a new or reconstructed major	Yes	

	affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.		
§ 63.9(b)(4)(ii) through (iv)...	Reserved.....	No.....	
§ 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.
§ 63.9(b)(5).....	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required.	Yes.....	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.9(c).....	Request for compliance extension.	Yes.....	
§ 63.9(d).....	Notification of special compliance requirements for new source.	Yes.....	
§ 63.9(e).....	Notification of performance test.	Yes.....	
§ 63.9(f).....	Notification of opacity and visible emissions observations.	No.....	Subpart WWWW of Part 63 does not contain opacity or visible

§ 63.9(g)(1).....	Additional notification requirements for sources using CMS.	Yes.....	emission standards. This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.9(g)(2).....	Notification of compliance with opacity emission standard.	No.....	Subpart WWWW of Part 63 does not contain opacity emission standards.
§ 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.
§ 63.9(h)(1) through (3).....	Notification of compliance status.	Yes.....	
§ 63.9(h)(4).....	Reserved.....	No.....	
§ 63.9(h)(5) and (6).....	Notification of compliance status.	Yes.....	
§ 63.9(i).....	Adjustment of submittal deadlines.	Yes.....	
§ 63.9(j).....	Change in information provided.	Yes.....	
§ 63.10(a).....	Applicability of recordkeeping and reporting.	Yes.....	
§ 63.10(b)(1).....	Records retention.....	Yes.....	
§ 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.
§ 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	Yes.....	

	evaluations.		
§ 63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting.	Yes	
§ 63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test.	Yes	
§ 63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status.	Yes	
§ 63.10(b)(3)	Records for applicability determinations.	Yes	
§ 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.
§ 63.10(c)(2) through (4)	Reserved	No	
§ 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.
§ 63.10(c)(9)	Reserved	No	
§ 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.
§ 63.10(d)(1)	General reporting requirements.	Yes	
§ 63.10(d)(2)	Report of performance test results.	Yes	
§ 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.

§ 63.10(d)(4).....	Progress reports as part of extension of compliance.	Yes.....	
§ 63.10(d)(5).....	Startup, shutdown, and malfunction reports.	Yes.....	Only applies if you use an add-on control device.
§ 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.
§ 63.10(e)(4).....	Reporting COMS data....	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.10(f).....	Waiver for recordkeeping or reporting.	Yes.....	
§ 63.11.....	Control device requirements.	Yes.....	Only applies if you elect to use a flare as a control device.
§ 63.12.....	State authority and delegations.	Yes.....	
§ 63.13.....	Addresses of State air pollution control agencies and EPA Regional Offices.	Yes.....	
§ 63.14.....	Incorporations by reference.	Yes.....	
§ 63.15.....	Availability of information and confidentiality.	Yes.....	

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E.1.3            One Time Deadlines Relating to NESHAP WWWW

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- (a)    The Permittee must conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.
  
- (b)    A notification of compliance status shall be submitted as follows:
  - (1)    If complying with organic HAP emissions limit average provisions, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2007.
  
  - (2)    If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limits other than organic HAP emissions limit averaging, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2006.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Interplastic Corporation/Molding Products Division  
Source Address: 1545 South Olive Street, South Bend, Indiana 46619  
Mailing Address: 1545 South Olive Street, South Bend, Indiana 46619  
Part 70 Permit No.: T141-24622-00091

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-50  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Interplastic Corporation/Molding Products Division  
Source Address: 1545 South Olive Street, South Bend, Indiana 46619  
Mailing Address: 1545 South Olive Street, South Bend, Indiana 46619  
Part 70 Permit No.: T141-24622-00091

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Interplastic Corporation/Molding Products Division  
Source Address: 1545 South Olive Street, South Bend, Indiana 46619  
Mailing Address: 1545 South Olive Street, South Bend, Indiana 46619  
Part 70 Permit No.: T141-24622-00091

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

Addendum to the  
Technical Support Document for a Part 70 Operating Permit Renewal

Source Name: Interplastic Corporation/Molding Products Division  
Source Location: 1545 S. Olive Street, South Bend, Indiana 46619  
County: St. Joseph  
SIC Code: 3087, 3089  
Operation Permit No.: T141-24622-00091  
Permit Reviewer: Stephanie Wilkerson

On October 15, 2007, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune in South Bend, Indiana, stating that Interplastic Corporation/Molding Products Division had applied for a Title V renewal for a stationary sheet molding compound (SMC) manufacturing facility. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

No comments from the source or the public were received regarding the issuance of this permit renewal. However, one administrative change will be made.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes.

**Administrative Change:**

Operation Permit No.: T141-24622-00091	
Issued by: <del>Nisha Sizemore, Chief</del> <b>Matthew Stuckey, Deputy Branch Chief</b> Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Interplastic Corporation/Molding Products Division</b>
<b>Source Location:</b>	<b>1545 S. Olive Street, South Bend, Indiana 46619</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3087, 3089</b>
<b>Permit Renewal No.:</b>	<b>T141-24622-00091</b>
<b>Permit Reviewer:</b>	<b>Stephanie Wilkerson</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Interplastic Corporation/Molding Products Division relating to the operation of a stationary sheet molding compound (SMC) manufacturing facility.

**History**

On April 13, 2007, Interplastic Corporation/Molding Products Division submitted an abbreviated application to the OAQ requesting to renew its operating permit based on information contained in the recently issued Significant Permit Modification, SPM141-21111-00091.

**Permitted Emission Units and Pollution Control Equipment**

- (a) Six (6) SMC paste mixers identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and Tabletop Cowles mixer #6, with a maximum total production of 108,405 tons of SMC paste per year. The particulate emissions from the six (6) mixers are controlled by one (1) baghouse.
- (b) Two (2) 48-inch sheet molding machines, identified as SMC machine #1 and SMC machine #2, with a maximum total throughput of 50,315 tons of sheet molding compound (SMC) per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in an existing affected source.

**Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

There are no unpermitted emission units or pollution control equipment at this location at the time of the permit renewal.

**Emission Units and Pollution Control Equipment Removed From the Source**

There are no emission units or pollution control equipment removed from this location at the time of the permit renewal.

**Insignificant Activities**

- (a) Three (3) polyester resin storage/holding tanks, identified as Tank #6, Tank #7, and Tank #8, each with a capacity of 2,700 gallons.
- (b) One (1) polyester resin day tank/blending tank, with a capacity of 2,250 gallons.

- (c) One (1) 2A-side feed tank, with a capacity of 720 gallons.
- (d) One (1) 2B-side feed tank, with a capacity of 360 gallons.
- (e) Four (4) polyester resin storage/holding tanks, identified as Tank #12, Tank #13, Tank #14, and Tank #15, each with a capacity of 2,818 gallons.
- (f) One (1) 1A-side paste holding tank, with a capacity of 195 gallons.
- (g) One (1) 1B-side paste holding tank, with a capacity of 192 gallons.
- (h) One (1) SMC #2 holding tank/thickener tank, with a capacity of 195 gallons.
- (i) Maturization room, with a capacity of 50,315 tons of SMC per year.

Under 40 CFR 63, Subpart WWWW, all emission units in this section are considered existing units in an existing affected source.

### Existing Approvals

Since the issuance of the Part 70 Operating Permit 141-6465-00091 on July 17, 2002, the source has constructed or has been operating under the following approvals:

- (a) First Administrative Amendment No. 141-16291-00091, issued on September 12, 2004;
- (b) Second Administrative Amendment No. 141-19342-00091, issued on December 13, 2002; and
- (c) First Significant Permit Modification No. 141-21111-00091, issued on March 22, 2007.

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 registrations and permits are superseded by this permit.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Warehouse Heater	30	0.33	150	100
S2	Warehouse Heater	30	0.33	150	100
S3	Warehouse Heater	30	0.33	150	100
S4	Warehouse Heater	30	0.33	150	100

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Unclassifiable

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.

- (a) St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) St. Joseph County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, Lead, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) 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 emissions are not counted toward determination of PSD applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	49.89
PM-10	49.93
SO <sub>2</sub>	0.00
VOC	91.24
CO	0.70
NO <sub>x</sub>	0.83

HAPs	tons/year
Styrene	91.19
Total	91.19

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) 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 equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

#### Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2004 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
<b>PM</b>	21.23
<b>PM-10</b>	21.23
<b>SO<sub>2</sub></b>	0.00
<b>VOC</b>	5.218
<b>CO</b>	0.00
<b>NO<sub>x</sub></b>	0.00
<b>HAP (Styrene)</b>	5.218

**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 assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Hockmeyer (small Cowles Mixer #1	0.05		-	13.09	-	-	13.09
Large Cowles Mixer #2			-	13.09	-	-	13.09
Large Littleford Mixer #3			-	17.00	-	-	17.00
Small Littleford Mixer #4			-	7.14	-	-	7.14
Shar Mixer #5			-	17.00	-	-	17.00
Tabletop Cowles Mixer #6			-	0.00	-	-	0.00
SMC Machine #1	Neg.*		-	11.75	-	-	11.75
SMC Machine #2	Neg.*		-	11.75	-	-	11.75
<b>Total Emissions</b>	<b>0.05</b>		-	<b>90.81</b>	-	-	<b>90.81</b>

**Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Each SMC Machine - VHAP (Styrene)	N	N	11.8	11.8	100/10	N	N
Mixers - VHAP (Styrene)	N	Y	67.3	67.3	100/10	N	N
Mixers - PM	Y	Y	49.87	0.05	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

(b) New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60):

- (1) 326 IAC 12, and 40 CFR Part 60.110c, Subpart Kb – New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

Storage/Holding Tanks #6, #7, and #8, each with a capacity of 2,700 gallons; Storage/Holding Tanks #12, #13, #14 and #15, each with a capacity of 2,818 gallons; Day tank/blending tank, with a capacity of 2,250 gallons; 2A-Side Feed Tank, with a capacity of 720 gallons; 2B-Side Feed Tank, with a capacity of 360 gallons; 1A-Side Paste Holding Tank and SMC #2 Holding Tank/Thickener Tank, each with a capacity of 195 gallons; 1B-Side Paste Holding Tank, with a capacity of 192 gallons; are not subject to NSPS, Subpart Kb because each tank has a storage capacity of less than 40 cubic meters (10,576 gallons). Therefore, these requirements are not included in this permit.

- (2) There are no other New Source Performance Standards included in this permit renewal for the source.

(c) National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63).

40 CFR Part 63, Subpart WWWW applies to the source because it is a major source of HAPs emissions. The source is an existing major source with a compliance date of April 21, 2006.

The issued Part 70 permit does not have the NESHAP WWWW applicability determination. Therefore, it will be incorporated in this permit renewal:

- (1) 40 CFR Part 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. This rule applies to sources that own and operate a reinforced plastic composites production that is located at a major source of HAP emissions. The following operations are subject to this rule: closed molding, open molding, centrifugal casting, continuous lamination/casting, polymer casting, pultrusion, SMC manufacturing, equipment cleaning, mixing, BMC manufacturing, repair and storage of HAP-containing materials.

The following operations are subject to this NESHAP:

- (A) Six (6) SMC paste mixers, identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Tabletop Cowles mixer #6, and Shar Mixer #5 with a maximum total production of 37,730 tons of SMC paste per year. The Particulate emissions from the five mixers are controlled by one (1) baghouse.
- (B) Two (2) 48-inch sheet molding machines, identified as SMC machine #1 and SMC machine #2, with a maximum total throughput of 50,315 tons of sheet molding compound (SMC) per year.

Insignificant Activities:

- (A) Three (3) polyester resin storage/holding tanks, identified as Tank #6, Tank #7, and Tank #8, each with a capacity of 2,700 gallons.
- (B) One (1) polyester resin day tank/blending tank, with a capacity of 2,250 gallons.
- (C) One (1) 2A-side feed tank, with a capacity of 720 gallons.
- (D) One (1) 2B-side feed tank, with a capacity of 360 gallons.
- (E) Four (4) polyester resin storage/holding tanks, identified as Tank #12, Tank #13, Tank #14, and Tank #15, each with a capacity of 2,818 gallons.
- (F) One (1) 1A-side paste holding tank, with a capacity of 195 gallons.
- (G) One (1) 1B-side paste holding tank, with a capacity of 192 gallons.
- (H) One (1) SMC #2 holding tank/thickener tank, with a capacity of 195 gallons
- (I) Maturization room, with a capacity of 50,315 tons of SMC per year.

Non-applicable portions of the NESHAP will not be included in the permit. The following sections of 40 CFR Part 63, Subpart WWWW will be applicable to the above fiberglass facilities:

- 40 CFR 63.5780
- 40 CFR 63.5785(a)
- 40 CFR 63.5790(a), (b)
- 40 CFR 63.5795(b)
- 40 CFR 63.5797
- 40 CFR 63.5799
- 40 CFR 63.5800
- 40 CFR 63.5835(a)
- 40 CFR 63.5840
- 40 CFR 63.5860(a)
- 40 CFR 63.5895(c)
- 40 CFR 63.5905
- 40 CFR 63.5915(a)(1), (c), and (d)
- 40 CFR 63.5920
- 40 CFR 63.5925
- 40 CFR 63.5930
- 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.

The following operations are not subject to 40 CFR Part 63, Subpart WWWW, since they are used for Research and Development:

- (a) Extrusion process used for prototype Research and Development (R&D), with a maximum throughput of 3000 pounds per year.
  - (b) Four (4) compression presses for closed molding, identified as Press #1, Press #2, Press #3, and Press #4, used for prototype R&D.
- (2) 40 CFR Part 63, Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters

The natural gas combustion units shown in the table below used for the building heating and cooling system are not subject to this NESHAP, because they are not considered process heaters. Therefore, these requirements are not included in this permit.

Lennox Rooftop Unit (Unit #1, Unit #2, and Unit #3) each with a 0.5 MMBtu/hr heat input
Carrier Package Systems (Unit #4 and Unit #5) each at 0.2 MMBtu/hr heat input
Lennox Pulse Units (Unit #6 and Unit #7) each at 0.26 MMBtu/hr heat input
Weather Rite Units (Unit #1 and Unit #2) each at 0.99 MMBtu/hr heat input
Applied Air System Unit (Unit #3) with 1.2 MMBtu/hr heat input

### State Rule Applicability - Entire Source

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

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. Because the source does not have a potential to emit greater than the thresholds given in 326 IAC 2-6-3(a)(1), the source shall submit an emissions report on a triennial basis, rather than an annual basis.

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2007. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

The original Part 70 permit has limited the VOC emissions to less than 25 tons per year from the mixers to avoid the applicability of this rule. The Permittee requested a re-evaluation of the applicability of 326 IAC 8-1-6 with the First Significant Permit Modification, and as a result, OAQ concluded that the following mixers are not subject to this rule, and therefore, the VOC limits have been deleted from the permit:

- (1) The Hockmeyer Small Cowles (Mixer #1) and the Tabletop Cowles (Mixer #6) were constructed in 1978. Therefore, these mixers are not subject to 326 IAC 8-1-6, because these mixers were constructed before January 1, 1980, the applicability date of this rule.
- (2) The Large Littleford (Mixer #3), was constructed in 1998; however, it is not subject to 326 IAC 8-1-6, because its potential VOC emissions are less than 25 tons per year.
- (3) The Large Cowles (Mixer #2), was constructed in 1997; however, it is not subject to 326 IAC 8-1-6, because its potential VOC emissions are less than 25 tons per year.
- (4) The Shar Mixer #5, was constructed in May 2006; however, it is not subject to 326 IAC 8-1-6, because its potential VOC emissions are less than 25 tons per year.
- (5) The Small Littleford (Mixer #4), was constructed in 1998; however, it is not subject to 326 IAC 8-1-6, because its potential VOC emissions are less than 25 tons per year.
- (6) The one (1) sheet molding machine, identified as SMC#1 is not subject to 326 IAC 8-1-6, because it was constructed in July 1978, which is before January 1, 1980, the applicability date of this rule.
- (7) The one (1) sheet molding machine, identified as SMC #2 was constructed in April 1998. It is not subject to 326 IAC 8-1-6, because its VOC potential emissions are less than 25 tons per year.

Mixer #2, Mixer #5, and SMC machine SMC#2 were installed at different times and should be considered separate facilities under 326 IAC 8-1-6.

### 326 IAC 20-56 (Reinforced Plastic Composites Production)

This rule applies to the source as provided in 40 CFR 63.5785. Therefore, the Permittee must comply with 40 CFR 63, Subpart WWWW.

- (a) 326 IAC 20-56-2 (Operator Training)

The source does not perform resin or gel coat spraying or related applications; as such, it does not meet the requirements of 326 IAC 20-56-2(a), and the Operator Training requirements of 326 IAC 20-56-2 do not apply.

### 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The various natural gas combustion units for building heating and cooling are not subject to this rule because they are not sources of indirect heating.

### 326 IAC 5-1 (Opacity Limitations)

The source is located north of Kern Road and east of Pine Road in St. Joseph County. Pursuant to 326 IAC 5-1-1 (Applicability), the source shall be subject to the provisions of 326 IAC 5-1-2(2), as follows:

- (a) 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:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability – Individual Facilities

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

The operation of each mixer was limited by the issued Part 70 Permit to emit less than ten (10) tons per year for a single HAP and/or less than twenty-five (25) tons per year for a combination of HAPs; however, pursuant to 326 IAC 2-4.1-1(b)(2), because each mixer is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, each mixer is exempt from the requirements of 326 IAC 2-4.1.

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

The six (6) mixers, identified as Hockmeyer (small Cowles) mixer #1, Large Cowles mixer #2, Large Littleford mixer #3, Small Littleford mixer #4, Shar mixer #5, and tabletop Cowles mixer #6 are subject to 326 IAC 6-3-2(e), when operating at a total process weight of 24,750 pounds per hour, the combined PM emissions shall not exceed 22.12 pounds per hour, based on the following equation:

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

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

The uncontrolled potential PM emissions of the six (6) mixers is 11.39 pounds per hour, based on an uncontrolled PTE of 49.87 tons per year for PM, so the source is able to comply with the limit without the baghouse.

Based on this determination and a request from the source, there will be no parametric or visible emissions monitoring required for the baghouse controlling the six (6) SMC mixers.

## Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

- (a) The baghouse for the six (6) SMC paste mixers has applicable compliance determination as specified below:
  - 1. Testing Requirements
    - (a) Within 180 days after the issuance of the Significant Permit Modification 141-21111-00091, dated March 22, 2007, the Permittee shall conduct PM testing of the uncontrolled six (6) SMC paste mixers utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

## 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:

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

An application for the purposes of this review was received on April 13, 2007. Additional information was received on June 1, 2007.

## Conclusion

The operation of this stationary sheet molding compound (SMC) manufacturing facility shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 141-24622-00091.

**Appendix A: Emissions Calculations  
SMC Production**

**Company Name:** Interplastic Corporation  
**Address, City, IN, Zip:** 1545 South Olive Street, South Bend, Indiana 46619-4293  
**Permit Number:** T141-24622-00091  
**Pit ID:** 141-00091  
**Reviewer:** Stephanie Wilkerson  
**Date:** June 18, 2007

Operation/Material	Weight % Volatile (H2O & Organics)	Weight % Organics	Volume % Water	Maximum Throughput	Emission Factor from the NESHAP Document	VOC/HAP Emission (tons/yr) based on NESHAP EF	Emission Factor from a Similar Source (lb VOC/lb styrene Compounded)	VOC/HAP Emissions (tons/year) Based on a Similar Source EF	Unpublished CFA Emission Factor (lbVOC/ton compound processed)	VOC Emissions (tons/year) Based on CFA EF
<b>SMC Production</b>										
2 units 48" Machine/resin	12.00%	12.0%	0.0%	50315 tons/yr			0.00389	<b>23.49</b>	0.30	<b>7.55</b>
<b>Paste Production</b>										
Large Littleford Mixer #3 (installed 3/98)	18.00%	18.0%	0.0%	27,375 tons/yr	0.25 % of available HAP/VOC	<b>12.32</b>	0.00345	<b>17.00</b>	0.78	<b>10.68</b>
Large Cowles Mixer #2 (installed 4/97)	18.00%	18.0%	0.0%	21078.75 tons/yr	0.25 % of available HAP/VOC	<b>9.49</b>	0.00345	<b>13.09</b>	0.78	<b>8.22</b>
Hockmeyer (small Cowles) Mixer #1 (installed 7/78)	18.00%	18.0%	0.0%	21078.75 tons/yr	0.25 % of available HAP/VOC	<b>9.49</b>	0.00345	<b>13.09</b>	0.78	<b>8.22</b>
Shar Mixer #5 (installed 5/06)	18.00%	18.0%	0.0%	27375 tons/yr	0.25 % of available HAP/VOC	<b>12.32</b>	0.00345	<b>17.00</b>	0.78	<b>10.68</b>
Tabletop Cowles Mixer #6 (installed 7/78)	18.00%	18.0%	0.0%	0.10 ton/yr	0.25 % of available HAP/VOC	<b>0.00</b>	0.00345	<b>0.00</b>	0.78	<b>0.00</b>
Small Littleford Mixer #4 (installed 3/98)	18.00%	18.0%	0.0%	11497.5 tons/yr	0.25 % of available HAP/VOC	<b>5.17</b>	0.00345	<b>7.14</b>	0.78	<b>8.78</b>
								<b>90.81</b>		
<b>Compression (Closed) Molding</b>										
Prototype for R & D	12.00%	12.0%	0.0%	175000 lbs/yr					AP-42, Chapter 4, Emission Factor	VOC Emissions (tons/year) Based on the AP-42 EF
12 x 12 plaques	12.00%	12.0%	0.0%	12000 lbs/yr					3.0%	<b>0.32</b>
Extrusion Process				3000 lb/yr					1 lb/ton based from Wisconsin DNR Study	<b>0.001</b>
					CFA Emission Factor (lb/ton)	VOC/HAP Emission (tons/yr)				
				Maturation Room	50315 tons/yr	0.002	<b>0.045</b>			
					Emission Factor *	Filler/Powder Loading %	Uncontrolled PM/PM10 Emissions (tons/year)	Controlled PM/PM10 (tons/yr)		
				6 Mixers	108405.1 tons/yr	0.10%	46.00%	49.87	0.05	
<b>Potential Emissions</b>							<b>49.87</b>	<b>0.05</b>	<b>TOTAL HAP/VOC</b>	<b>91.19</b>

**Note:**

The current Part 70 requires stack testing to verify the CFA emission factors used in determining the Mixers VOC PTE.

\* PM/PM10 Emission Factor based on mass balance testing conducted at the plant, 0.10% material added to the mixer is lost.

(1) The three (3) Emission Factors utilized in the VOC/HAP calculations of the Mixers emissions came from stack testing information of a similar 48" SMC machine and mixers at Venture Industries, Conneaut, Ohio; CFA Unpublished Emission Factors; and EPA published Document for the NESHAP-Production of Reinforce Composites. The worst case among the sources of the Emission Factors for VOC/HAP have been considered in the PTE determinations. Therefore, no VOC/HAP stack testing has been required in this significant permit modification.

(2) The two Emission Factors utilized in the VOC/HAP calculations of the SMC Machines emissions came from stack testing information of a similar 48" SMC machine at Venture Industries, Conneaut, Ohio and Unpublished CFA Emission Factor.

All VOC/HAP calculations are for styrene.

**METHODOLOGY**

VOC Emissions, tons/yr = throughput, tons/yr \* VOC weight % \* Emission Factor

PM/PM10 Emissions, tons/yr = throughput, tons/yr \* PM/PM10 Emission Factor \* ton/2000 lb

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Interplastic Corporation / Molding Products Division

**Address City IN Zip:** 1545 S. Olive Street, South Bend, IN 46619

**Permit No.:** T141-24622-00091

**Plt ID:** 141-00091

**Reviewer:** Stephanie Wilkerson

**Date:** June 18, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.9

16.6

Facilities (MMBtu/hr)			
Lennox Rooftop Unit (Unit #1)	0.5	Lennox Pulse Unit (Unit #6)	0.26
Lennox Rooftop Unit (Unit #2)	0.5	Lennox Pulse Unit (Unit #7)	0.26
Lennox Rooftop Unit (Unit #3)	0.5	Weather Rite Unit (Unit #1)	0.99
Carrier Package System (Unit #4)	0.2	Weather Rite Unit (Unit #2)	0.99
Carrier Package System (Unit #5)	0.2	Applied Air System Unit (Unit #1)	1.2
		<b>Total</b>	<b>1.9</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0**	5.5	84.0
Potential Emission in tons/yr	0.02	0.06	0.00	0.00	0.05	0.70

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton