



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: November 21, 2007  
RE: Noble Composites, Inc. / 039-24638-00556  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

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

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

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
MC61-53 IGCN1003  
Indianapolis, Indiana 46204-2251  
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November 21, 2007

Mr. Joe Speicher  
Noble Composites, Inc.  
2424 East Kercher Road  
Goshen, IN 46526

Re: 039-24638-00556  
Fourth Significant Permit Modification to  
Part 70 No.: T 039-16024-00556

Dear Mr. Joe Speicher:

Noble Composites, Inc. was issued a permit on April 23, 2004 for a stationary fiberglass and wood reinforced plastic flat panel manufacturing plant. A letter requesting changes to this permit was received on April 4, 2007. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of a new stationary fiberglass and wood reinforced plastic flat panel manufacturing line.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, a copy of the entire revised permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Robert Henry, OAQ, 100 North Senate Avenue, MC61-53 IGCN1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Robert Henry or extension 4-5175, or dial (317) 234-5175.

Sincerely,

*Original document signed by*

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

REH

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Greg Wingstrom  
Compliance Data Section  
Administrative and Development



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

**Noble Composites, Inc.  
 2424 East Kercher Road  
 Goshen, Indiana 46526**

(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.: T039-16024-00556	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 23, 2004  Expiration Date: April 23, 2009
First Administrative Amendment No. 039-19052-00556, issued by June 29, 2004 First Significant Source Modification No. 039-19224-00556, issued-September 23, 2004 First Significant Permit Modification No. 039-19630-00556, issued October 12, 2004 Second Administrative Amendment No. 039-20894-00556, issued March 24, 2005 Second Significant Permit Modification No.: 039-22337-00556, issued February 28, 2006 Third Significant Permit Modification No.: 039-21468-00556, issued June 8, 2006 Third Administrative Amendment No.: 039-23742-00556, issued December 19, 2006	
Fourth Significant Permit Modification No.: 039-24638-00556	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 21, 2007  Expiration Date: April 23, 2009

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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 fiberglass and wood reinforced plastic flat panel manufacturing plant.

Source Address:	2424 East Kercher Road, Goshen, Indiana 46526
Mailing Address:	100 First Stamford Place, Stamford, Connecticut 06902
General Source Phone Number:	(574) 534-0010
SIC Code:	3083
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under Emission Offset and 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) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

- (e) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]
- (f) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.

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):

Emission units or activities with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than either five (5) pounds per hour or twenty-five (25) pounds per day consisting of:

- (1) One (1) mill room (identified as EU4), equipped with two (2) panel saws (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]
- (2) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).
- (3) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.

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

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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

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

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

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### 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 T039-16024-00556 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.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a 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.

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

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

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### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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### B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

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### B.8 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.9 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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. 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.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
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 the D Sections of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMP's shall include:
- (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 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.12 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
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); and

- (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.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in 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, issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits established prior to T039-16024-00556 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
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 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; and
  - (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 that apply to the initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
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  
MC61-53 IGCN1003  
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)]

- (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]

- (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  
MC61-53 IGCN1003  
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). The notification requirement per (a)(4) of this condition does not apply to emission trades of SO<sub>2</sub> or NO<sub>x</sub> under 326 IAC 21 or 326 IAC 10-4.
- (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]**

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- (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  
MC61-53 IGCN1003  
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 (BLT)), 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]**

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

**C.2 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

**C.6 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC61-52 IGCN1003  
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 14-10-4-1, 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.8 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  
MC61-53 IGCN1003  
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]**

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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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.

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

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC61-53 IGCN1003  
Indianapolis, Indiana 46204-2251

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

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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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.14 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;
  - (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.

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

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

The 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]**

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- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)][326 IAC 2-7-19 (C)] [326 IAC 2-6]**
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- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated 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  
MC61-50 IGCN1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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- (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  
MC61-53 IGCN1003  
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) 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.19 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

## FACILITY OPERATION CONDITIONS

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

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

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

#### D.1.1 VOC and HAP Limits [326 IAC 8-1-6] [326 IAC 2-3]

- (a) Pursuant to 326 IAC 8-1-6, MSOP #039-14254-00556, issued on August 9, 2001, and SPR #039-16410-00556, issued on March 28, 2003, the fiberglass panel manufacturing operation is subject to the requirements of 326 IAC 8-1-6 because the potential emissions are greater than twenty-five (25) tons per year and there are no other applicable Article 8 rules that apply. This rule requires that the Best Available Control Technology (BACT) be used to control VOC emissions.
- (b) Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the fiberglass panel manufacturing operation shall be the following:
  - (1) The VOC emissions from the gel coat tunnels (EU1 and EU2) and the laminating tunnel (EU3) shall be controlled by a thermal oxidizer.
  - (2) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit volatile organic HAP and VOC before control from use of such resins and gel coats only shall be less than:
    - (A) Two hundred forty five (245) tons per twelve (12) consecutive month period with compliance determined at the end of each month before initial start-up of the thermal oxidizer; or
    - (B) 616 tons per twelve (12) consecutive month period after initial start-up of the thermal oxidizer, with compliance determined at the end of each month.

Compliance with these limits shall be determined based upon the following criteria:

- (i) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is

appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (ii) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 2001. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purpose of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (3) The overall VOC/HAP control efficiency for the thermal oxidizer, including destruction efficiency and capture efficiency, shall be greater than 95%. Combined with Condition D.1.1(b)(2)(B), this is equivalent to 30.8 tons/yr of VOC/HAP emissions after control. Compliance with this limit also makes the requirements of 326 IAC 2-3, Emission Offset not applicable.
- (4) Before initial start-up of the thermal oxidizer, the HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emission mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production <sup>1</sup> Gel Coat	36
Tooling Gel Coat	45
Production Resin	35
Tooling Resin	43

<sup>1</sup>Production refers to the manufacture of parts

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions for higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) < (Emissions from compliant resin or gel coat) - Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (HAP monomer emission factor for resin or gel coat used, %); EF, HAP monomer emission factor = emission factor expressed as pounds (lb) HAP emitted per ton of resin/gel coat

processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

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

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via the use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, controlled spray used in combination with automated actuators, or installing a control device.

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

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

- (7) The listed work practices shall be followed:
- (A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (B) For VOC- and/or HAP-containing materials:
    - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
    - (ii) Cleanup stations shall be closed containers having soft-gasketed, springloaded closures and shall be kept completely closed when not in use.
    - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
    - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
    - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (C) All material storage containers shall be kept covered when not in use.

- (a) Pursuant to 326 IAC 20-56 on and after April 21, 2006, the Permittee shall train all new and existing personnel, including contract personnel who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
  - (1) All personnel hired shall be trained within thirty (30) days of hiring.
  - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
  - (1) A copy of the current training program.
  - (2) A list of the following:
    - (A) All current personnel, by name, that are required to be trained.
    - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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

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Pursuant to MSOP #039-14254-00556, issued on August 9, 2001, SPR #039-16410-00556, issued on March 28, 2003, and 326 IAC 6-3-2(d), particulate from the gel coat tunnels (EU1 and EU2) and the laminating tunnel (EU3) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

**D.1.5 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)**

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Compliance with the HAP monomer content limitations in Conditions D.1.1(b)(2) and shall be determined by any of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.

- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternate method approved by IDEM, OAQ.
- (e) IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup the thermal oxidizer, the Permittee shall conduct a performance test to verify VOC/HAP control efficiency as per condition D.1.1(b)(3) for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.1.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than one minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1(b)(3) as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

#### D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure, or fan amperage, or blower frequency range from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1(b)(3) as approved by IDEM.
- (b) The duct pressure, or fan amperage, or blower frequency range shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

#### D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

### **D.1.10 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks EFG1 and EFL1 (before initial startup of the thermal oxidizer) or stack TO1 (after initial startup of the thermal oxidizer) while one or more of the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack(s) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1(b)(2), the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC and HAP emission limits before control. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain the following training records:
  - (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain the continuous temperature records for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain the daily records of the duct pressure, or fan amperage, or blower frequency range. The Permittee

shall include in its daily record when the duct pressure, or fan amperage, or blower frequency range reading is not taken and the reason for the lack of a duct pressure, or fan amperage, or blower frequency reading (e.g. the process did not operate that day).

- (e) To document compliance with Conditions D.1.12, the Permittee shall maintain a log of weekly and monthly overspray observations, daily and monthly inspections.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

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- (a) A monthly summary of the information to document compliance with Condition D.1.1(b)(2) shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

On and after April 21, 2006, when the source becomes subject to 326 IAC 20-56 and 40 CFR Part 63, Subpart WWWW, the requirements of this condition D.1.12(b) and 326 IAC 20-25-3 will no longer be applicable to the fiberglass operations.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] Sawing, Grinding, and Milling Operations**

- (e) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]
- (f) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.

Insignificant Activities that are emission units or activities with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than either five (5) pounds per hour or twenty-five (25) pounds per day consisting of:

- (1) One (1) mill room (identified as EU4), equipped with two (2) panel saw (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]
- (2) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).
- (3) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.

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

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

**D.2.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) rate from the insignificant activities shall be limited as shown in the following table.

Insignificant Activity	PM Limit (lbs/hr)	Process Weight Rate of Operation (lbs/hr)
Grinding and machining operations EU 4 and EU5	6.84	4,299
Sawing and Grinding Room EU10	7.42	4,849
Mill Room EU9	5.20	2,850

The pound per hour limitation was calculated as follows:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour, and  
P = process weight rate in tons per hour

#### D.2.2 Minor Source Modifications [326 IAC 2-7-10.5(d)]

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Pursuant to 326 IAC 2-7-10.5(d)(4)(C) (Minor Source Modifications), the baghouse (identified as DC2) to be used in conjunction with the grinding and machining operations (consisting of one (1) saw and grinding room, identified as EU5 and one (1) mill room, identified as EU4) will limit the PM and PM10 emissions from this process to less than 25 tons per year and shall comply with the following limits when the grinding and machining operations are in operation:

- (a) Operate with a control efficiency of at least 99%; and
- (b) Have no visible emissions.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

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- (a) Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.2.4 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the miscellaneous woodworking operations and saw and grinding rooms. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.2.5 Visible Emissions Notations [326 IAC 2-7-1(21)(G)(xxx)]

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- (a) Visible emission notations of the baghouses shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the grinding and machining operations at least once per day when the grinding and machining operations are in operation. When for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

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

**D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.2 and Condition D.2.5, the Permittee shall maintain daily records of once per day visible emission notations of the baghouse (identified as DC2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with D.2.6, the Permittee shall maintain a daily record of the pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

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

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

#### D.3.1 Emission Offset Minor Limit [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the VOC emissions including VOC emissions from the gel coat tunnels (EU6 and EU7) and lamination tunnel (EU8) shall be limited as follows:

- (a) The overall VOC control efficiency for the thermal oxidizer, including capture and control efficiency, shall be no less than 95%; and
- (b) The VOC input shall be limited in such a way that the potential to emit (PTE) shall not exceed fifty four (54) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits and the limits in Condition D.1.1 shall ensure that the entire source does not exceed one hundred (100) tons of VOC per year and renders the requirements of 326 IAC 2-3, Emission Offset not applicable.

Compliance with these limits shall be determined based upon the equation in Condition D.3.6 and the following criteria:

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. This reference is included with this permit. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene on an equivalent weight basis.

### D.3.2 Operator Training [326 IAC 20-56]

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- (a) Pursuant to 326 IAC 20-56, the Permittee shall train all new and existing personnel, including contract personnel who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
- (1) All personnel hired shall be trained within thirty (30) days of hiring;
  - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually; and
  - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques;
  - (2) Appropriate equipment cleaning procedures; and
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program; and
  - (2) A list of the following:
    - (A) All current personnel, by name, that are required to be trained; and
    - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

### D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

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Pursuant to 326 IAC 6-3-2(d), particulate from the gel coat tunnels (EU6 and EU7) and the laminating tunnel (EU8) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications at all times that these units are in operation.

### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## Compliance Determination Requirements

### D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Condition D.3.1, the Permittee shall conduct a performance test to verify VOC control efficiency to include capture and destruction efficiency, within sixty (60) days after achieving maximum production, but no later than one hundred eighty (180) days after initial start-up of emission units EU6, EU7, and EU8 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five

(5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.3.6 Volatile Organic Compounds (VOC)

Compliance with the Conditions D.3.1(b) shall be determined using the following calculation:

$$\text{VOC emissions (tons/month)} = \sum_{i=1}^n ((A_i * B_i) / 2000) * (\text{UEF}_i / 2000) * (1-C)$$

Where: n = no. of coatings used during the day

A<sub>i</sub> = Density (lb/gal resin or gel)

B<sub>i</sub> = Gallons of resin or gel used per month

C = Control efficiency of the thermal oxidizer (TO-2) (C = 95%)

UEF<sub>i</sub> = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)

i = type of resin or gel

2000 = conversion factor (lbs/ton)

#### D.3.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.3.1 as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

#### D.3.8 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the limits in condition D.3.2 as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

#### D.3.9 Volatile Organic Compound (VOC) Control

In order to demonstrate compliance with D.3.1, the VOC emissions from the gel coat tunnels (EU6 and EU7) and the laminating tunnel (EU8) shall be controlled by the thermal oxidizer (VECD2) at all times that these units are in operation.

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

#### D.3.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack TO-2 while the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions

or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### **D.3.11 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC emission limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.3.3, the Permittee shall maintain the following training records:
- (1) A copy of the current training program; and
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain the continuous temperature records for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document compliance with Condition D.3.8, the Permittee shall maintain daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when the duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).
- (e) To document compliance with Conditions D.3.10, the Permittee shall maintain a log of weekly and monthly overspray observations, daily and monthly inspections.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.12 Reporting Requirements

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A monthly summary of the information to document compliance with shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION E.1

## SOURCE OPERATION CONDITIONS

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

(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 schedule in 40 CFR 63 Subpart WWWW.

#### E.1.2 Reinforced Plastics Composites Production NESHAP [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 with a compliance date of April 21, 2006, as specified 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.

- (b) You are not subject to this subpart if your facility only repairs reinforced plastic composites. Repair includes the non-routine manufacture of individual components or parts intended to repair a larger item as defined in §63.5935
- (c) You are not subject to this subpart if your facility is a research and development facility as defined in section 112(c)(7) of the Clean Air Act (CAA).
- (d) You are not subject to this subpart if your reinforced plastic composites operations use less than 1.2 tons per year (tpy) of thermoset resins and gel coats that contain styrene combined.

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

- (a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.
- (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.
- (c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.
- (d) Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

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

- (a) A reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraphs (a)(1) and (2) of this section.
  - (1) You commence construction of the source after August 2, 2001.
  - (2) You commence construction, and no other reinforced plastic composites production source exists at that site.
- (b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

## **Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting**

### **§ 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?**

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

### **§ 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.

### **§ 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?**

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

- (a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in Sec. 63.5850.

- (b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.

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

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in Sec. 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 Sec. 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.

- (b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.
- (1) Use a calculated emission factor. Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.
- (2) Conduct performance testing. Conduct performance testing using the test procedures in Sec. 63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.
- (c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must

recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in Sec. 63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

## **Compliance Dates and Standards**

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

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

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

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

- (b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.
- (c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.
- (e) If you have a new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, you must notify your permitting authority in your compliance report. You may at the same time request a one-time exemption from the requirements of paragraph (a)(1) or (d) of this section in your compliance report if you can demonstrate all of the following:
  - (1) The exceedance of the threshold was due to circumstances that will not be repeated.
  - (2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.
  - (3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in §63.5799.
- (f) If you apply for an exemption in paragraph (e) of this section and subsequently exceed the HAP emission thresholds specified in paragraph (a)(2) or (c) of this section over the next 12-month period, you must notify the permitting authority in your semiannual report, the exemption is removed, and your facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time your organic HAP emissions first exceeded the threshold.
- (g) If you have repair operations subject to this subpart as defined in §63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of this section.
- (h) If you use an add-on control device to comply with this subpart, you must meet all requirements contained in 40 CFR part 63, subpart SS.

## Options for Meeting Standards

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

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

- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.
- (1) Calculate your actual organic HAP emission factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: The neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Sec. 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified of appendix A to subpart WWWW of 40 CFR part 63. If you are using add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100} \quad (\text{Eq. 1})$$

Where:

Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850 to this subpart.

- (2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission

limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

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

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

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

Where:

Actual Process Stream  $EF_i$  = actual organic HAP emissions factor for process stream  $i$ , lbs/ton;

$\text{Material}_i$  = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream  $i$ , tons;

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

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

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

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open

molding operations and centrifugal casting operations may not be averaged with each other.

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

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

Where:

EL<sub>i</sub> = organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

N = number of operations.

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

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

Where:

Actual Individual EF<sub>i</sub> = Actual organic HAP emissions factor for operation type i, lbs/ton;

Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

N = number of operations.

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

- (d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
- (1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.
  - (2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
  - (3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.
  - (4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

## **General Compliance Requirements**

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

- (a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.
- (b) You must be in compliance with all organic HAP emissions limits in this subpart that you meet using add-on controls, except during periods of startup, shutdown, and malfunction.
- (c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- (d) You must develop and implement a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emissions limits you meet using an add-on control.

## **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.

**§ 63.5845 When must I conduct subsequent performance tests?**

You must conduct a performance test every 5 years following the initial performance test for any standard you meet with an add-on control device.

**§ 63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?**

- (a) If you are using any add-on controls to meet an organic HAP emissions limit in this subpart, you must conduct each performance test, performance evaluation, and design evaluation in 40 CFR Part 63, Subpart SS, that applies to you. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 to this subpart.
- (b) Each performance test must be conducted according to the requirements in §63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.
- (c) Each performance evaluation must be conducted according to the requirements in §63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.
- (d) You may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in §63.7(e)(1).
- (e) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of this section.
  - (1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.
  - (2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.
  - (3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.
  - (4) You may use American Society for Testing and Materials (ASTM) D6420–99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428–2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.
    - (i) If the target compound(s) is listed in Section 1.1 of ASTM D6420–99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

- (ii) If the target compound(s) is not listed in Section 1.1 of ASTM D6420–99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420–99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.
  - (iii) If a minimum of one sample/analysis cycle is completed at least every 15 minutes.
- (5) Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by §63.997(e)(2)(iii)(C). You may use American Society of Mechanical Engineers (ASME) PTC 19–10–1981–Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007–2900, or online at [www.asme.org/catalog](http://www.asme.org/catalog)) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.
- (f) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.
  - (g) If you are using a concentrator/oxidizer control device, you must test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, you must test both stacks simultaneously with the inlet to the concentrator to determine the overall control device efficiency.
  - (h) During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

#### **§ 63.5855 What are my monitor installation and operation requirements?**

You must monitor and operate all add-on control devices according to the procedures in 40 CFR Part 63, Subpart SS.

#### **§ 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.
- (b) If using an add-on control device to demonstrate compliance, you must also establish each control device operating limit in 40 CFR Part 63, Subpart SS, that applies to you.

#### **Continuous Compliance Requirements**

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

- (a) During production, you must collect and keep a record of data as indicated in 40 CFR Part 63, Subpart SS, if you are using an add-on control device.
- (b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.

- (1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.
  - (2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
  - (3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.
  - (4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.
- (d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

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

- (a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.
- (1) Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated following the procedures in 40 CFR part 63, subpart SS. Sources using add-on controls may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to control parameter monitoring.
  - (2) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual

resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

- (3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).
  - (4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.
- (b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.
  - (c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.
  - (d) When you use an add-on control device to meet standards in §63.5805, you are not required to meet those standards during periods of startup, shutdown, or malfunction, but you must operate your affected source in accordance with the startup, shutdown, and malfunction plan.
  - (e) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) of this section are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e).

### **Notifications, Reports, and Records**

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

- (a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

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

- (a) You must submit each report in Table 14 to this subpart that applies to you.
- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
  - (1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.

- (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.
  - (3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - (5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
- (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
- (1) Company name and address.
  - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (3) Date of the report and beginning and ending dates of the reporting period.
  - (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
  - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
  - (6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.
- (d) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The total operating time of each affected source during the reporting period.
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

- (e) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (4) of this section and in paragraphs (e)(1) through (12) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The date and time that each malfunction started and stopped.
  - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (3) The date, time, and duration that each CMS was out of control, including the information in §63.8(c)(8).
  - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.
  - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
  - (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - (8) An identification of each organic HAP that was monitored at the affected source.
  - (9) A brief description of the process units.
  - (10) A brief description of the CMS.
  - (11) The date of the latest CMS certification or audit.
  - (12) A description of any changes in CMS, processes, or controls since the last reporting period.
- (f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).
- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.
- (i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

**§ 63.5915 What records must I keep?**

- (a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.
  - (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
  - (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
  - (3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).
- (b) If you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.
- (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 un-pigmented, 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 non-mechanical 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 non-mechanical tools, such as brushes and rollers. Materials are rolled out or worked by using non-mechanical 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 non-mechanical 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 1 to Subpart WWWW of Part 63—Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

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

As specified in §63.5010, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams.

If your operation type is a new or existing...

And you use... With...

Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP less than 33 percent organic HAP (19 percent for nonatomized gel coat) 214...  
 Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP less than 33 percent organic HAP (19 percent for nonatomized gel coat) 214...  
 Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP less than 33 percent organic HAP (19 percent for nonatomized gel coat) 214...

i. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000$	$EF = \{(0.286 \times \%HAP) - 0.0529\} \times 2000$
		ii. vapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000 \times \{(1 - (0.5 \times VSE \text{ factor}))\}$	$EF = \{(0.286 \times \%HAP) - 0.0529\} \times 2000 \times \{(1 - (0.5 \times VSE \text{ factor}))\}$
		iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.126 \times \%HAP \times 2000 \times 0.8$	$EF = \{(0.286 \times \%HAP) - 0.0529\} \times 2000 \times 0.8$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = (0.126 \times \%HAP \times 2000 \times 0.5)$	$EF = \{(0.286 \times \%HAP) - 0.0529\} \times 2000 \times 0.5$
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000$	$EF = \{(0.714 \times \%HAP) - 0.18\} \times 2000$
		ii. vapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times \{(1 - (0.45 \times VSE \text{ factor}))\}$	$EF = \{(0.714 \times \%HAP) - 0.18\} \times 2000 \times \{(1 - (0.45 \times VSE \text{ factor}))\}$
		iii. vacuum bagging/closed-mold curing with roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.85$	$EF = \{(0.714 \times \%HAP) - 0.18\} \times 2000 \times 0.85$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.55$	$EF = \{(0.714 \times \%HAP) - 0.18\} \times 2000 \times 0.55$
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000$	$EF = \{(0.157 \times \%HAP) - 0.0165\} \times 2000$
		ii. vapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000 \times \{(1 - (0.45 \times VSE \text{ factor}))\}$	$EF = \{(0.157 \times \%HAP) - 0.0165\} \times 2000 \times \{(1 - (0.45 \times VSE \text{ factor}))\}$
		iii. closed-mold curing with roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.85$	$EF = \{(0.157 \times \%HAP) - 0.0165\} \times 2000 \times 0.85$
		iv. vacuum bagging/closed-mold curing without roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.55$	$EF = \{(0.157 \times \%HAP) - 0.0165\} \times 2000 \times 0.55$
	d. atomized mechanical resin application with robotic or automated spray control	nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times 0.77$	$EF = 0.77 \times \{(0.714 \times \%HAP) - 0.18\} \times 2000$
	e. filament application	i. nonvapor-suppressed resin	$EF = 0.184 \times \%HAP \times 2000$	$EF = \{(0.2746 \times \%HAP) - 0.0298\} \times 2000$
		ii. vapor-suppressed resin	$EF = 0.12 \times \%HAP \times 2000$	$EF = \{(0.2746 \times \%HAP) - 0.0298\} \times 2000 \times 0.65$
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000$	$EF = \{(1.03546 \times \%HAP) - 0.195\} \times 2000$

5. nonatomized spray gel coat application	nonvapor-suppressed gel coat	$EF = 0.185 \times \text{HAP} \times 2000$	$EF = (0.4506 \times \text{HAP}) - 0.0505 \times 2000$
h. atomized spray gel coat application using robotic or automated spray	nonvapor-suppressed gel coat	$EF = 0.445 \times \text{HAP} \times 2000 \times 0.73$	$EF = (1.03646 \times \text{HAP}) - 0.195 \times 2000 \times 0.73$
2. centrifugal casting operations <sup>78</sup>	a. heated air blown through molds	$EF = 0.558 \times (\text{HAP}) \times 2000$	$EF = 0.558 \times (\text{HAP}) \times 2000$
	b. vented molds, but air vented through the molds is not heated	$EF = 0.026 \times (\text{HAP}) \times 2000$	$EF = 0.026 \times (\text{HAP}) \times 2000$

Footnotes to Table 1

<sup>1</sup> The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart MMW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

<sup>2</sup> To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

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

<sup>4</sup> The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

<sup>5</sup> This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

<sup>6</sup> Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

<sup>7</sup> These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

<sup>8</sup> If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

TABLE 2 TO SUBPART WWWW OF PART 63—COMPLIANCE DATES FOR NEW AND EXISTING REINFORCED PLASTIC COMPOSITES FACILITIES

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

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

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

If your operation type is . . .	And you use . . .	1\ Your organic HAP emissions limit is . . .
1. open molding_corrosion-resistant and/or high strength	a. mechanical resin application b. filament application. c. manual resin application.	113 lb/ton. 171 lb/ton. 123 lb/ton
CR/HS).		
2. open molding_non-CR/HS.....	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding_tooling.....	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding_low-flame spread/low-smoke products.	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding_shrinkage controlled resins \2\.	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding_gel coat \3\....	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high. performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton 854 lb/ton 522 lb/ton

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

\2\ This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

\3\ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you

use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.  
\5\ Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in § 63.5796.

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.
6. all mixing or BMC manufacturing operations <sup>1</sup>	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations <sup>1</sup>	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations <sup>1</sup>	keep the mixer covers closed keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

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

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

If your facility has the following resin type and application method . . . .	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, you can use for. .	Is . . . .
7. Tooling resins, nonatomized mechanical.	Tooling manual.....	91.4
8. Tooling resins, manual.....	Tooling atomized mechanical.	45.9

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

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

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

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For . . .	That must meet the following organic HAP emissions limit . . .	You have demonstrated initial compliance if . . .
		iii. You demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

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

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For . . .	That must meet the following standard . . .	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	The owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or

For . . .	tanks may be vented as ----- That must meet the following standard . . .	covered except when adding or ----- You have demonstrated initial compliance if . . .
	necessary for safety.	removing materials, and that any bulk storage tanks are vented only as necessary for safety.
6. an existing or new mixing or BMC Manufacturing Operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

Table 13 to Subpart WWWW of Part 63--Applicability and Timing of Notifications  
As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit. . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information	No later than the dates specified in § 63.9(b)(2).

specified in  
 § 63.9(b)(2).

If your facility . . .	You must submit . .	By this date . . .
3. Qualifies for a compliance extension as specified in § 63.9(c).	A request for a compliance extension as specified in § 63.9(c).	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device.	a. A notification of intent to conduct a performance test as specified in § 63.9(e).	No later than the date specified in § 63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in § 63.9(g).	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in § 63.9(h).	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

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

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

You must submit a(n)	contain . . .	the report . . .
1. Compliance report.....	a. A statement that there were no deviations during that reporting period if there were no	Semiannually according to the requirements in §63.5910(b).



EU1, EU2, and EU3 with a compliance date of April 21, 2006. Compliance with the requirements specified in condition E.1.2 shall satisfy the requirements of 326 IAC 20-56, with the exception of the requirements listed under 40 CFR 53.5810, 40 CFR 63.5895(d), and Tables 1, 3, and 7 in that condition. In place of those requirements, to satisfy 326 IAC 20-56 only, the Permittee shall comply with the following:

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

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

- (a) Meet the individual organic HAP emissions limits for each operation. Demonstrate that you meet the individual organic HAP emissions limits for each open molding operation and for each centrifugal casting operation type in Tables 3, or 5 to this subpart that apply to you. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method you use in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. Your calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 to this subpart based on a 12-month rolling average. Use the procedures described in paragraphs (a)(1) through (3) of this section to calculate average organic HAP emissions factors for each of your operations.
  - (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: The neat resin plus or neat gel coat plus organic HAP content, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Sec. 63.5796. If you want to use vapor suppressants to meet the organic HAP emissions limit for open molding, you must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of appendix A to subpart WWWW of 40 CFR part 63. If you want to use an add-on control device to meet the organic HAP emissions limit, you must determine the add-on control factor by conducting capture and control efficiency testing, using the procedures specified in Sec. 63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or site-specific emissions factors, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100} \quad (\text{Eq. 1})$$

Where:

Percent Control Efficiency=a value calculated from organic HAP emissions test measurements made according to the requirements of Sec. 63.5850 to this subpart.

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

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

Where:

Actual Process Stream  $EF_i$  = actual organic HAP emissions factor for process stream  $i$ , lbs/ton

$\text{Material}_i$  = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream  $i$ , tons

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

- (b) HAP Emissions factor averaging option. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Tables 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.
- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Tables 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months. Use Equation 3 of this section to calculate the weighted average organic HAP emissions limit for all open molding operations and separately for all centrifugal casting operations.

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

Where:

EL<sub>i</sub> = organic HAP emissions limit for operation type i, lbs/ton from Tables 3, 5 or 7 to this subpart

Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons

N = number of operations

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

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

Where:

Actual Individual EF<sub>i</sub> = Actual organic HAP emissions factor for operation type i, lbs/ton

Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons

N = number of operations

- (3) Compare the values calculated in paragraphs (b)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.
- (c) If you have multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resin(s) for all operations of that resin type. If you have more than one operation type, you may meet the emission limit for one of those operations, and use the same resin(s) in all other open molding and centrifugal casting operations.
- (1) This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
- (2) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic

HAP emissions limit for any one of these operations and use that operation's same resin in all of the resin operations listed in this paragraph. Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If your resin organic HAP content is below the applicable values shown in Table 7 to this subpart, you are in compliance.

- (3) You may also use a weighted average organic HAP content for each operation described in paragraph (c)(2) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in Sec. 63.5810(a)(2) except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
  - (4) You may simultaneously use the averaging provisions in paragraph (b) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (c)(2) and (3) of this section. However, any resins for which you claim compliance under the option in paragraphs (c)(2) and (3) of this section may not be included in any of the averaging calculations described in paragraphs (a) or (b) of this section used for resins for which you are not claiming compliance under this option.
- (d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to this subpart.

**Sec. 63.5895 How do I monitor and collect data to demonstrate continuous compliance?**

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

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

- (a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.
- (2) Compliance with organic HAP emissions limits is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 3, or 5 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits, as discussed in Sec. 63.5895(d).
  - (3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in Sec. 63.5895(d).

**Sec. 63.5910 What reports must I submit and when?**

- (f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to Sec. 63.5805(b) or (d). Include with this report any request for an exemption under Sec. 63.5805(e). If you receive an exemption under Sec. 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in Sec. 63.5805(f).

**Sec. 63.5935 What definitions apply to this subpart?**

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

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

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

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

**TABLE 1 TO SUBPART WWW OF PART 63—EQUATIONS TO CALCULATE ORGANIC HAP EMISSIONS FACTORS FOR SPECIFIC OPEN MOLDING AND CENTRIFUGAL CASTING PROCESS STREAMS**

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

If your operation type is a new or existing . . .	And you use . . .	With . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) <sup>1 2 3</sup> . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) <sup>1 2 3</sup>
1. Open molding operation	<p>c. Nonatomized mechanical resin application.</p> <p>d. Atomized mechanical resin application with robotic or automated spray control <sup>4</sup>.</p>	<p>v. Nonvapor-suppressed resin.</p> <p>vi. Vapor-suppressed resin</p> <p>vii. Closed-mold curing with roll-out.</p> <p>viii. Vacuum bagging/ closed-mold curing without roll-out.</p> <p>Nonvapor-suppressed resin.</p>	<p>EF = 0.107 x%<i>HAP</i> x 2000.</p> <p>EF = 0.107 x%<i>HAP</i> x 2000 x(1- (0.45 x VSE factor)).</p> <p>EF = 0.107 x %<i>HAP</i> x 2000 x0.85.</p> <p>EF = 0.107 x%<i>HAP</i> x 2000 x0.55.</p> <p>EF = 0.169 x%<i>HAP</i> x 2000 x0.77.</p>	<p>EF = ((0.157 x %<i>HAP</i>)- 0.0165) x2000</p> <p>EF = ((0.157 x %<i>HAP</i>)- 0.0165) x2000 x (1- (0.45 xVSE factor))</p> <p>EF = ((0.157 x %<i>HAP</i>)- 0.0165) x 2000 x 0.85</p> <p>EF = ((0.157 x %<i>HAP</i>)- 0.0165) x2000 x 0.55</p> <p>EF = 0.77 x ((0.714 x %<i>HAP</i>)- 0.18) x2000</p>

If your operation type is a new or existing . . .	And you use . . .	With . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) <sup>1 2 3</sup> . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) <sup>1 2 3</sup>
	<p>e. Filament application <sup>5</sup></p> <p>f. Atomized spray gel coat application.</p> <p>g. Nonatomized spray gel coat application..</p> <p>h. Manual gel coat application<sup>6</sup>.</p>	<p>i. Nonvapor-suppressed resin.</p> <p>ii. Vapor-suppressed resin</p> <p>Nonvapor-suppressed gel coat.</p> <p>Nonvapor-suppressed gelcoat.</p> <p>Nonvapor-suppressed gelcoat.</p>	<p>EF = 0.184 x%<sup>2</sup>HAP x 2000.</p> <p>EF = 0.12 x%<sup>2</sup>HAP x2000</p> <p>EF = 0.446 x%<sup>2</sup>HAP x 2000.</p> <p>EF = 0.185 x%<sup>2</sup>HAP x 2000.</p> <p>EF = 0.126 x%<sup>2</sup>HAP x 2000 (for emission estimation only, see footnote 6)</p>	<p>EF = ((0.2746 x %HAP)- 0.0298) x2000</p> <p>EF = ((0.2746 x %HAP)- 0.0298) x2000 x 0.65</p> <p>EF = ((1.03646 x %HAP)- 0.195) x2000.</p> <p>EF = ((0.4506 x %HAP)- 0.0505) x2000.</p> <p>EF = ((0.286 x %HAP)- 0.0529) x2000 (for emissions estimation only, see footnote 6)</p>

**Footnotes to Table 1**

<sup>1</sup> To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of § 63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

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

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

<sup>4</sup> This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

<sup>5</sup> Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

<sup>6</sup> Do not use this equation for determining compliance with emission limits in Tables 3 or 5 to this subpart. To determine compliance with emission limits you must treat all gel coat as if it were applied as part of your gel coat spray application operations. If you apply gel coat by manual techniques only, you must treat the gel coat as if it were applied with atomized spray and use Equation 1.f. to determine compliance with the appropriate emission limits in Tables 3 or 5 to this subpart. To estimate emissions from manually applied gel coat, you may either include the gel coat quantities you apply manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of your gel coat.

<sup>7</sup> These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

<sup>8</sup> If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

**TABLE 2 TO SUBPART WWWW OF PART 63—COMPLIANCE DATES FOR NEW AND EXISTING REINFORCED PLASTIC COMPOSITES FACILITIES**

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

If your facility is . . .                      And . . .                      Then you must comply by this date

1. An existing sourcea. Is a major source on or before publication date of this subpart i. April 21, 2006,  
ii. You must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.

TABLE 3 TO SUBPART WWWW OF PART 63—ORGANIC HAPS EMISSIONS LIMITS FOR EXISTING OPEN MOLDING SOURCES, NEW OPEN MOLDING SOURCES, EMITTING LESS THAN 100 TPY OF HAP, AND NEW AND EXISTING CENTRIFUGAL CASTING AND CONTINUOUS LAMINATION/CASTING SOURCES THAT EMIT LESS THAN 100 TPY OF HAP

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

And the highest organic HAP content for a If your operation type is . . . compliant resin or gel coat is <sup>2</sup> . . .	And you use . . .	Your organic HAP emissions limit is <sup>1</sup>
-----		
1. Open molding_corrosion-resistant and/or high strength(CR/HS) resin application	a. Mechanical resin application.....	112 lb/ton.....
46.2 with nonatomized resin application	b. Filament application .....	171 lb/ton.....
42.0.	c. Manual resin application.....	123 lb/ton.....
40.0.		
2. Open molding_non-CR/HS	a. Mechanical resin application.....	87 lb/ton.....
45.0.	38.4 with nonatomized resin	188 lb/ton.....
	b. Filament application .....	87 lb/ton.....
33.6.	c. Manual resin application.....	
3. Open molding_tooling	a. Mechanical resin application.....	254 lb/ton.....
43.0 with atomized application,		
391.4 with nonatomized application	b. Manual resin application. ....	157 lb/ton.....
45.9		
4. Open molding_low-flame spread/low-smoke products.	a. Mechanical resin application.....	497 lb/ton.....
60.0.	b. Filament application.....	270 lb/ton.....
60.0.	c. Manual resin application .....	238 lb/ton.....
60.0.		
5. Open molding_shrinkage controlled resins.	a. Mechanical resin application .....	354 lb/ton.....
50.0.	b. Filament application.....	215 lb/ton.....
50.0.	c. Manual resin application. ....	180 lb/ton.....
50.0.		
6. Open molding_gel coat <sup>3</sup>	a. Tooling gel coating.....	437 lb/ton.....
40.0.	b. White/off white pigmented gel coating. ....	267 lb/ton.....
30.0.	c. All other pigmented gel coating.....	377 lb/ton.....
37.0.	e. Fire retardant gel coat.....	854 lb/ton.....
44.0.	f. Clear production gel coat.....	522 lb/ton.....

Footnotes to Table 3

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

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

\3\ These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied

- gel coat as if it were applied with atomized spray for compliance determinations.
- \4\ Centrifugal casting operations where the mold is not vented during spinning and cure are considered to be closed molding and are not subject to any emissions limit. Centrifugal casting operations where the mold is not vented during spinning and cure, and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques are considered to be open molding operations and the appropriate open molding emission limits apply.
- \5\ Centrifugal casting operations where the mold is vented during spinning and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques, use the appropriate centrifugal casting emission limit to determine compliance. Calculate your emission factor using the appropriate centrifugal casting emission factor in Table 1 to this subpart, or a site specific emission factor as discussed in § 63.5796.
- \6\ Pultrusion machines that produce parts with 1000 or more reinforcements and a cross sectional area of 60 inches or more are not subject to this requirement. Their requirement is the work practice of air flow management **which is described in Table 4 to this subpart.**

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

For ...	You must ...
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
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.
6. all mixing or BMC manufacturing operations <sup>1</sup>	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations <sup>1</sup>	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations <sup>1</sup>	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria:	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across

For ...	You must ...
1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s),
	v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

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

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

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

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

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
1. CR/HS resins, centrifugal casting <sup>1,2</sup>	a. CR/HS mechanical	<sup>3</sup> 48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	<sup>3</sup> 45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting <sup>1,2</sup>	45.0

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting <sup>1,2</sup>	38.5
6. non-CR/HS resins, centrifugal casting <sup>1,2</sup>	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

<sup>1</sup>If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

<sup>2</sup>If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

<sup>3</sup>Nonatomized mechanical application must be used.

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

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

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

to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate

-----  
 For . . . That must meet the following organic HAP emissions limit . . . You have demonstrated initial compliance if . . .  
 -----  
 organic HAP contents.  
 -----

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

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

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 . . .
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
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	keep containers that store HAP-containing materials closed or	the owner or operator submits a certified statement in the notice of

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
operation	covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety	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.
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.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. Not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. clover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

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).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b)(4) and (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in §63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device	a. A notification of intent to conduct a performance test as specified in §63.9(e)	No later than the date specified in §63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in §63.9(g)	The date of submission of notification of intent to conduct a performance test.

If your facility . . .	You must submit . . .	By this date . . .
	c. A Notification of Compliance Status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

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

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

You must submit a(n)	contain . . .	the report . . .
1. Compliance report.....	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you.	Semiannually according to the requirements in §63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.	a. Actions taken for the event.  b. The information in § 63.10(d)(5)(ii).	By fax or telephone within 2 working days after starting actions inconsistent with the plan. By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§ 63.10(d)(5)(ii).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556

**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  
MC61-53 IGCN1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556

**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 Describe:
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 Quarterly Report

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556  
Facility: Fiberglass panel manufacturing unit (EU1, EU2, and EU3)  
Parameter: VOC/HAP Emissions before control  
Limit: (a) 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month (before initial start-up of the thermal oxidizer); or  
(b) 616 tons per twelve (12) consecutive month period with compliance determined at the end of each month (after initial start-up the thermal oxidizer)

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556  
Facility: Fiberglass panel manufacturing unit (EU6, EU7, and EU8)  
Parameter: VOC Emissions  
Limit: Fifty four (54) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete 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: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556

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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period."</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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>	
<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 Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Noble Composites, Inc.
Source Location:	2424 East Kercher Road, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3083
Operation Permit No.:	T 039-16024-00556
Operation Permit Issuance Date:	April 23, 2004
Significant Source Modification No.:	039-24568-00556
Significant Permit Modification No.:	039-24638-00556
Permit Reviewer:	Robert Henry

On August 22, 2007, the Office of Air Quality (OAQ) had a notice published in the Goshen News in Goshen, Indiana, stating that Noble Composites had applied for a modification to the Part 70 Operating Permit No. 039-16024-00556. The notice also stated that OAQ proposed to issue a permit for this modification and provided information on how the public could review the proposed permit 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 should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit to correct typographical errors (bolded language has been added, the language with a line through it has been deleted).

### D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition ~~D.3.2~~ **D.3.1**, the Permittee shall conduct a performance test to verify VOC control efficiency to include capture and destruction efficiency, within sixty (60) days after achieving maximum production, but no later than one hundred eighty (180) days after initial start-up of emission units EU6, EU7, and EU8 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

### D.3.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition ~~D.3.2~~ **D.3.1** as approved by IDEM.

...

On September 18, 2007, Kevin Parks of D&B Environmental Services on behalf of Noble Composites submitted comments. The comments and revisions to the permit (**bolded** language has been added, the language with a line through it has been deleted) are as follows:

Comment No. 1

In Section A.2 (a), the two (2) emission units EU1 and EU2 are described as, “**Closed**” molding operations. The emission units EU1 and EU2 are, “**Open**” molding operations.

Response No. 1

This typographical error has been corrected as follows:

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) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing ~~closed~~ **open** molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

...

Comment No. 2

In Sections A.3 (a) and (b) and the Descriptive Box of Section D.2, Noble concurs that the emission rates of the processes are insignificant. However, dust collectors DC1 and DC3 have an exhaust flow rate of 10,000 acfm each and dust collectors DC2 and DC4 have an exhaust flow rate of 8,000 acfm each. For this reason, the descriptive information in Section A.3(b) and D.2 is inaccurate for the emission units EU4, EU5, EU9, and EU10 (i.e., “...and a gas flow rate less than or equal to 4,000 actual cubic feet per minute; .....”).

Response No.2

IDEM agrees that these units are not covered under 326 IAC 2-7-1(21)(G)(xxiii) because the acfm is higher than allowed under this definition. Therefore, these units must have a potential to emit of PM10 less than five (5) pounds per hour or twenty five (25) pounds per day to be classified as insignificant activities under 326 IAC 2-7-1(21)(B). The sawing and grinding rooms EU5 and EU10 are not insignificant activities because these facilities have a potential to emit of PM10 of 6.86 pounds per hour before controls. The mill rooms EU4 and EU9 have a potential to emit of 0.83 pounds per hour before controls and are still classified as insignificant activities. There are no applicable requirements for these emission units that will be affected by this change. The facility descriptions in Sections A.2, A.3, and D.2 have been corrected as follows:

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) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (e) **One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]**
- (f) **One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by baghouse DC4 and exhausted at stack DC4.**

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) ~~Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone consisting of:~~  
**Emission units or activities with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than either five (5) pounds per hour or twenty-five (25) pounds per day consisting of:**
  - (1) ~~One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]~~
  - (2) One (1) mill room (identified as EU4), equipped with two (2) panel saws (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]
  - (3) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).

- ~~(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]~~
- (1) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.
- (23) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] ~~Insignificant Activities~~ Sawing, Grinding, and Milling Operations

~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]~~

- (e) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]
- (f) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.

**Insignificant Activities that are emission units or activities with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than either five (5) pounds per hour or twenty-five (25) pounds per day consisting of:**

- ~~(1) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]~~
- ~~(2)~~ One (1) mill room (identified as EU4), equipped with two (2) panel saw (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]
- (32) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).

<p>(4) <del>One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.</del></p> <p>(53) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.</p> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>
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Comment No.3

In Condition C.12 - Emergency Reduction Plans, Noble has already submitted its Emission Reduction Plan to IDEM as required by 326 IAC 1-5-2. Noble suggests revising Condition C.12 (a) to Read:

- (a) The Permittee shall revise its written emergency reduction plans (ERPs) to incorporate the new equipment authorized by this permit consistent with safe operating procedures.

Response No.3

IDEM is aware that the source will only be revising the past emergency reduction plans (ERPs) to incorporate the new equipment. However, a complete ERP must be submitted for this source within ninety (90) days after the issuance of this permit. This ERP must cover the new equipment. No change has been made to the proposed permit as a result of this comment.

Comment No.4

In Condition D.1.12, final paragraph, the reference to Condition D.1.15(b) should be changed to reference Condition D.1.12(b) since there is no condition D.1.15.

Response No.4

Condition D.1.12 has been corrected as follows:

D.1.12 Reporting Requirements

- (a) A monthly summary of the information to document compliance with Condition D.1.1(b)(2) shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

On and after April 21, 2006, when the source becomes subject to 326 IAC 20-56 and 40 CFR Part 63, Subpart WWWW, the requirements of this condition ~~D.1.12(b)~~ and 326 IAC 20-25-3 will no longer be applicable to the fiberglass operations.

Comment No.5

Condition D.3.6 should reference Condition D.3.1(b), Emission Offset Minor Limit, and not Condition D.3.2, Operator Training.

Response No.5

Condition D.3.6 has been corrected as follows:

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the Conditions ~~D.3.2~~ **D.3.1(b)** shall be determined using the following calculation:

$$\text{VOC emissions (tons/month)} = \sum_{i=1}^n ((A_i * B_i) / 2000) * (UEF_i / 2000) * (1-C)$$

Where: n = no. of coatings used during the day

A<sub>i</sub> = Density (lb/gal resin or gel)

B<sub>i</sub> = Gallons of resin or gel used per month

C = Control efficiency of the thermal oxidizer (TO-2) (C = 95%)

UEF<sub>i</sub> = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)

i = type of resin or gel

2000 = conversion factor (lbs/ton)

Comment No. 6

In Condition E.1.2, please revise §63.5805 by:

- a. Removing 40 CFR §63.5805 (a)
- b. Adding 40 CFR §63.5805 (b), (c), (e), and (f) in their entirety
- c. Add Parts 6, 7, and 8 to Tables 4 and 9

Response No. 6

These changes have been made as follows:

E.1.2 Reinforced Plastics Composites Production NESHAP [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 with a compliance date of April 21, 2006, as specified as follows:

...

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

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

- ~~(a) If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous laminating/casting operations, but the combination of all centrifugal casting and~~

~~continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.~~

- (b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.
- (c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.
- (e) If you have a new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, you must notify your permitting authority in your compliance report. You may at the same time request a one-time exemption from the requirements of paragraph (a)(1) or (d) of this section in your compliance report if you can demonstrate all of the following:
  - (1) The exceedance of the threshold was due to circumstances that will not be repeated.
  - (2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.
  - (3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in §63.5799.
- (f) If you apply for an exemption in paragraph (e) of this section and subsequently exceed the HAP emission thresholds specified in paragraph (a)(2) or (c) of this section over the next 12-month period, you must notify the permitting authority in your semiannual report, the exemption is removed, and your facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time your organic HAP emissions first exceeded the threshold.

...

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.
6. all mixing or BMC manufacturing operations <sup>1</sup>	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations <sup>1</sup>	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations <sup>1</sup>	keep the mixer covers closed keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
\1\ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.	

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

For . . .	That must meet the following standard . . .	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.	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

	Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	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.
6. an existing or new mixing or BMC Manufacturing Operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing	keep the mixer covers closed during mixing	the owner or operator submits a certified statement in the notice

operation

except when adding  
materials to the  
mixing vessels

of compliance status  
that mixers closed  
except when adding  
materials to the  
mixing vessels.

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Comment No.7

In Condition E.1.3 (a) and (b), the deadlines stipulated have passed and Noble has submitted the required reports. Additionally, Condition E.1.3(a) conflicts with Condition D.3.5.

Noble will be required to submit a change to its Notification of Compliance Status Report within fifteen days of the issuance of the permit per 40 CFR §63.5905. Therefore, Noble suggests that the proposed Section E.1.3 be replaced with:

"Within fifteen (15) days from the issuance of this permit, the Permittee shall submit a revised Notification of Compliance Status Report to IDEM as required by 40 CFR §63.5905."

Response No.7

Condition E.1.3 reflects the one time deadlines required by the NESHAP. If the required reports have been submitted, then the Permittee can certify compliance with this provision. Additionally, Condition E.1.3 does not conflict with D.3.5. 40 CFR 63.5905(b) states, "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." This modification has not changed any information submitted in any of the past notifications. Condition D.3.5 is consistent with the NESHAP by requiring a performance test within sixty (60) days after achieving maximum production, but no later than one hundred eighty (180) days after initial start-up of emission units EU6, EU7, and EU8 controlled by the thermal oxidizer.

Comment No. 8

On Page 87 of 89 referencing the Part 70 Quarterly Report for emission units EU6, EU7, and EU8, the emission rate on the form should be listed as fifty four (54) tons and not sixty (60) tons. This is consistent with the revised Technical Support Document referencing the Emission Offset Limit.

Response No.8

This quarterly report has been corrected as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section  
  
Part 70 Quarterly Report**

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556  
Facility: Fiberglass panel manufacturing unit (EU6, EU7, and EU8)

Parameter: VOC Emissions  
Limit: ~~Sixty (60)~~ **Fifty four (54)** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

#### Comment No.9

In Condition D.3.9 - Volatile Organic Compound (VOC) Control, this permit condition should allow for a reasonable period of time for process shut down in the event of an emergency or the need for a repair to the thermal oxidizer VECD2. Noble is requesting that language be inserted into the Condition that would allow for a temporary upset or an emergency. For example, "The Permittee shall be allowed to operate for a period of no more than four (4) hours, per incident, without the use of the thermal oxidizer in the event of the need for repair of the thermal oxidizer or in an emergency to prevent the loss of life or damage to equipment. This operating period should be minimized to the extent possible and may not allow for an exceedance of the emission limits established in either Condition D.3.1 or 40 CFR §63, Subpart WWWW".

#### Response No.9

Condition B.11 addresses emergency occurrences, which allows the Permittee to continue to operate the affected emission unit during an emergency provided that reasonable steps to correct the emergency to minimize emissions are taken, including other steps to be taken under this condition. In addition, response to excursion or exceedances of an emission standard is addressed in Condition C.16. Therefore, it is not necessary to add additional provisions in Condition D.3.9 to address an emergency.

#### Comment No.10

Noble has concerns with the wording of existing permit Conditions D.1.7, Thermal Oxidizer Temperature, D.1.8, Parametric Monitoring and the proposed Conditions D.3.7 and D.3.8 (same parameters). The reason for this concern is that IDEM requires that the performance test be conducted under conditions of maximum operating capacity. When the process operates at its highest capacity, the VOC loading will be at its highest level and subsequently the heat content of the gas stream will be greater than under normal operating conditions. This causes the average hourly operating temperature to be arbitrarily higher than necessary to achieve the required destructive efficiency. For Noble to assure continued compliance with Conditions D.1.7 and D.3.7, the thermal oxidizer(s) would need to operate at a minimum set point temperature equal to that of the average hourly temperature of the performance test(s). This requirement places an unnecessary auxiliary fuel consumption burden on the source.

Both the existing and proposed processes are subject to 40 CFR §63.999(b)(3), Subpart SS that requires the operating ranges for monitoring parameters be established during the performance test. Subpart SS allows for the supplementation of performance data with manufacturer's data and engineering assessments to establish the operating ranges. These conditions as currently worded do not allow for either the manufacturer's recommended operating design parameters nor do they account for any process fluctuation. Therefore, Noble requests the following language in lieu of Conditions D.1.7, D.1.8, D.3.7, and D.3.8:

The Permittee shall operate and monitor all control devices according to the procedures in 40 CFR 63, Subpart SS and pursuant to 40 CFR Subpart WWWW, §63.5855. Pursuant to 40 CFR Subpart SS §63.999(b)(3), the Permittee shall establish the specific range for each emission point operating parameter measured during the most recent performance test. From the date of permit issuance until the results of an approved performance test are available, the Permittee shall operate the thermal oxidizer according to the

manufacturers recommended set point temperature and blower setting as to assure compliance with the 95% overall capture and control efficiency requirement. Once the results of an approved performance test are available, the Permittee shall establish the operating temperature and either the blower frequency, fan amperage, or duct pressure operating ranges from the most recent performance test. The Permittee shall operate the control device within the operating ranges established during the performance test once those results have been approved by IDEM.

Within ninety (90) days of the issuance of this Permit, the Permittee shall develop and implement a Compliance Assurance Monitoring Plan describing the methods used to establish the operating ranges from the most recent performance test and the methods that will be used to assure continuous compliance.

Response No.10

326 IAC 3-6-3(b)(1) requires that testing of emission units be conducted while the units are being operated at 95% to 100% of permitted operating capacity. However, the Permittee can request to test under other capacities established, and approved by IDEM, pursuant to 326 IAC 3-6(b)(3). Therefore, no changes have been made to the proposed permit as a result of this comment.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Description and Location

Source Name:	Noble Composites, Inc.
Source Location:	2424 East Kercher Road, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3083
Operation Permit No.:	T 039-16024-00556
Operation Permit Issuance Date:	April 23, 2004
Significant Source Modification No.:	039-24568-00556
Significant Permit Modification No.:	039-24638-00556
Permit Reviewer:	Robert Henry

#### Existing Approvals

The source was issued Part 70 Operating Permit No. 039-16024-00556, issued on April 23, 2004. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
First Administrative Amendment	039-19052-00556	June 29, 2004
First Significant Permit Modification	039-19630-00556	October 12, 2004
Second Administrative Amendment	039-20894-00556	March 24, 2005
Second Significant Permit Modification	039-22337-00556	February 28, 2006
Third Significant Permit Modification	039-21468-00556	June 8, 2006
Third Administrative Amendment	039-23742-00556	December 19, 2006

#### County Attainment Status

The source is located in Elkhart County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purpose of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are

considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) Elkhart 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.
- (c) Elkhart County has been classified as attainment or unclassifiable for PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
----------------------

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

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	13.1
PM <sub>10</sub>	13.1
SO <sub>2</sub>	0.01
VOC	30.8*
CO	1.01
NO <sub>x</sub>	1.20

\*Note: The potential to emit of VOC from the entire source, prior to the proposed modification is limited by Condition D.1.1(b)(3) of permit No: SPM 039-21468-00556 to 30.8 tons per year, after control (RTO).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon the minor source modification, permit No: 039-21924-00556.

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

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
A single HAP	>10 tpy
Combination of HAPs	>25 tpy

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

### Actual Emissions

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

Pollutant	Actual Emissions (ton/yr)
PM	Not Reported
PM <sub>10</sub>	3
SO <sub>2</sub>	0
VOC	131
CO	0
NO <sub>x</sub>	0
HAP	Not Reported
Total HAPs	Not Reported

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Noble Composites on April 4, 2007, relating to the addition of a mold maintenance operation (MM2), two (2) gelcoat tunnels and reciprocators (EU6 and EU7), one (1) laminating tunnel with two (2) reciprocators (EU8), mill room woodworking operations (EU9) controlled by a dust collector (DC3), sawing and grinding operations (EU10) controlled by a dust collector (DC4), final finish operations (FF2), two (2) polyester resin storage tanks (T3 and T4), and various natural gas fired combustion equipment including one (1) regenerative thermal oxidizer (VECD2) that will be used to control the volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from emission units EU6, EU7, and EU8.

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

- (a) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.00 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2; and
- (b) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.00 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2.

Insignificant activities:

- One (1) mill room, identified as EU9, approved for construction in 2007, equipped with two (2) panel saws (EU9A and EU9B) and one (1) panel sander (EU9C) controlled by baghouse DC3 with a maximum airflow of 10,000 acfm and grain loading of 0.000437 grains per acf, and exhausting into the building. [326 IAC 6-3]
- One (1) saw and grinding room, identified as EU10, approved for construction in 2007, equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders,

controlled by baghouse DC4 with a maximum airflow of 8,000 acfm and grain loading of 0.001 grains per acf, and exhausting back into the building. [326 IAC 6-3]

- Three (3) space heaters, identified as H7, H8, and H9, approved for construction in 2007, each having a maximum capacity of 0.15 MMBTU per hour.
- Five (5) space heaters, identified as H10, H11, H12, H13, and H14, approved for construction in 2007, each having a maximum capacity of 0.75 MMBTU per hour.
- Two (2) fixed roof, cone, vertical, above ground, variable vapor space, resin storage tanks, identified as T3 and T4, approved for construction in 2007, each having a maximum tank capacity of six thousand (6,000) gallons.
- One (1) mold maintenance operation, identified as MM2, approved for construction in 2007, which consists of manually applying mold cleaners, sealers, and release agents.
- One (1) final finish operation, identified as FF2, approved for construction in 2007, which consists of manually applying finishing mineral oils and solvents.

**Enforcement Issues**

There are no pending enforcement actions.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
TO-2	EU6, EU7, EU8	30	3.33	64,550	174.3
Emergency Bypass Stack for EU6/7	EU6, EU7	30	3.33	16,000	85.0
Emergency Bypass Stack for EU8	EU8	30	3.33	16,000	85.0
DC3 Emergency Bypass*	EU9A,B,C	20.0	2.0	10,000	77.0
DC4 Emergency Bypass*	EU10A,B,C,D	36.0	2.0	8,000	77.0

\*Note: Stacks DC3, and DC4 vent back into the building.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations. TANKS calculations have been performed and verified by IDEM.

**Permit Level Determination – Part 70**

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

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

Pollutant	Potential To Emit (ton/yr)
PM	47.27
PM <sub>10</sub>	47.70
SO <sub>2</sub>	0.05
VOC	668.25
CO	6.33
NO <sub>x</sub>	4.69

HAPs	Potential To Emit (ton/yr)
Styrene	577.17
Toluene	0.72
2-Butanone	0.52
MMA	84.05
Xylene	0.05
Total Combined HAPs*	662.45

\*Note: Combined HAPs is different than the worst case scenario for the individual HAPs.

This source modification is subject to 326 IAC 2-7-10.5(f)(4) and 326 IAC 2-7-10.5(f)(6) because the potential to emit of PM, PM10, and VOC for this modification are greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12 (d)(1) and 326 IAC 2-7-12(b)(C)(i), because a case-by-case determination of an emission limitation or other standard was made.

**Permit Level Determination – PSD or Emission Offset**

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 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
TANKS-T3 and T4	-----	-----	-----	0.06	-----	-----
MM2 Mold Maintenance	0.00	0.00	-----	3.02	-----	-----
EU6, EU7, EU8 Gel Coat and Laminating Tunnels	0.67	0.67	-----	54.00*	-----	-----
EU9A/B/C Mill Room	0.16	0.16	-----	-----	-----	-----
EU10A/B/C/D Sawing and Grinding Room	0.30	0.30	-----	-----	-----	-----
FF2 Final Finish Operation	0.00	0.00	-----	3.60	-----	-----
RTO Combustion	0.11	0.43	0.03	0.31	4.78	2.85
Natural Gas Combustion from Heaters	0.03	0.14	0.01	0.10	1.55	1.84
Total for Modification	1.28	1.71	0.05	61.09	6.33	4.69
Total for the Source After This Modification	14.38	14.81	0.06	98.80**	7.34	5.89
Major Source Threshold-PSD	250	250	250	-----	250	-----
Major Source Threshold-EO	-----	-----	-----	100	-----	100

Note: All numbers are rounded to the nearest two decimal places. Total might not perfectly match the total of these numbers due to rounding. See the attached calculation sheets for further clarification.

\*Limited to 54 tons/yr in Condition D.3.2.

\*\*Based on 30.8 tons per year limit in D.1.1 plus 6.91 tons per year from the existing Tanks, MM2, FF2, and Natural Gas Combustion from all heaters and the thermal oxidizer.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds for PM, PM10, SO2, and CO. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing minor stationary source is not major because the emissions increase is less than the Emission Offset major source thresholds for VOC and NOX. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. Additionally, even after this proposed modification, the source will continue to be a minor source because the source-wide emissions will be limited to less than the major source threshold.

### Federal Rule Applicability Determination

The following federal rules are applicable to the source:

#### **NSPS:**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

#### **NESHAP:**

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56. The units subject to this rule include the following:
- (1) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1;
  - (2) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1;
  - (3) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2; and
  - (4) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2.
- (c) Pursuant to 40 CFR 63.5810, the Permittee has chosen to comply with the requirements of 40 CFR 63, Subpart WWWW by:
- (1) Demonstrating that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart, or

- (2) Demonstrating that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you, or
- (3) Demonstrating compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other, or
- (4) Meeting the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling, or
- (5) Using any combination of the above.

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

§63.5780  
§63.5785(a)  
§63.5790(a),(b),(c)  
§63.5795  
§63.5796  
§63.5797  
§63.5798  
§63.5799(b),(c)  
§63.5800  
§63.5805(a),(b),(h)  
§63.5810  
§63.5835  
§63.5840  
§63.5845  
§63.5850  
§63.5855  
§63.5860  
§63.5895  
§63.5900  
§63.5905  
§63.5910  
§63.5915  
§63.5920  
§63.5925  
§63.5930  
§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.

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet 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.

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU6 PM/PM10	Dry Filters	N	6.72	0.34	100	N	N
EU7 PM/PM10	Dry Filters	N	6.72	0.34	100	N	N
EU6 VOC	Thermal Oxidizer (TO-2)	Y	179.31	8.97	100	*No, since subject to NESHAP Subpart WWWW.	N
EU7 VOC	Thermal Oxidizer (TO-2)	Y	179.31	8.97	100	*No, since subject to NESHAP Subpart WWWW.	N
EU8 VOC	Thermal Oxidizer (TO-2)	Y	302.59	15.13	100	*No, since subject to NESHAP Subpart WWWW.	N
EU9A, B, C PM/PM10	Baghouse (DC3)	N	3.65	0.16	100	N	N
EU10A, B, C, D PM/PM10	Baghouse (DC4)	N	30.03	0.30	100	N	N

\*In these units, VOC = HAP. The VOCs emitted are styrene and MMA. The NESHAP, 40 CFR 63, Subpart WWWW is a post November 15, 1990 limitation or standard for HAPs.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any units in this modification.

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

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

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds for PM, PM10, SO2, and CO. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing minor stationary source is not major because the emissions increase is less than the Emission Offset major source thresholds for VOC and NOX. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. Additionally, even after this proposed modification, the source will continue to be a minor source because the source-wide emissions will be limited to less than the major threshold.

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

The operation of the new emission units will emit greater than ten (10) tons per year for a single HAP and/or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the new emission units, however, pursuant to 326 IAC 2-4.1-1(b)(2), because these new emission units are specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, these new emission units are exempt from the requirements of 326 IAC 2-4.1.

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2007, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**326 IAC 8 (VOC Rules)**

Pursuant to 326 IAC 8-1-6(3)(C), new facilities that are not otherwise regulated by 326 IAC 20-56 shall reduce VOC emissions using BACT. These units are regulated by 326 IAC 20-56 and therefore, are not subject to the 326 IAC 8-1-6 BACT requirement.

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

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

- (a) 40 CFR 63.5790
- (b) 40 CFR 63.5795
- (c) 40 CFR 63.5799
- (d) 40 CFR 63.5805
- (e) 40 CFR 63.5810
- (f) 40 CFR 63.5895
- (g) 40 CFR 63.5900
- (h) 40 CFR 63.5910
- (i) 40 CFR 63.5915
- (j) 40 CFR 63.5935

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

**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 modification are as follows:

The stationary fiberglass and wood reinforced plastic flat panel manufacturing plant has applicable compliance determination conditions as specified below:

- (a) Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation; and
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

The stationary fiberglass and wood reinforced plastic flat panel manufacturing plant has applicable compliance monitoring conditions as specified below:

- (a) Monthly inspections shall be performed of the coating emissions from the stack(s) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit;
- (b) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack TO2 the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit;
- (c) Visible emission notations of all process emission points shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal;
- (d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time;
- (e) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions;

- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit;
- (g) The duct pressure, or fan amperage, or blower frequency range shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (h) The thermal oxidizer shall be monitored in accordance with the following requirements.
  - (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.
  - (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1(b)(3) as approved by IDEM.

These monitoring conditions are necessary because the baghouses and thermal oxidizer must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), and to avoid 326 IAC 2-2 (PSD).

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T039-16024-00556. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (1) IDEM, OAQ has determined that it is not necessary to list the Responsible Official name or title in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). The revised permit condition is as follows:

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

The Permittee owns and operates a stationary fiberglass and wood reinforced plastic flat panel manufacturing plant.

~~Responsible Official: Vice President - Environment, Health and Safety~~

- (2) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Modeling Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-50 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-52 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

- (3) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of original Condition B.11 – Preventive Maintenance Plan and has amended original Condition B.12 – Emergency Provisions. In order to clarify some other conditions in Section B, the following changes were made.

B.9 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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) ~~The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMP's shall include:~~ **If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:**
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

**B.12 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.**

- (4) Conditions C.6 and C.7 were updated to clarify the permit conditions. Condition C.10 was changed to correct the time allotted for the source to implement the compliance monitoring requirements. Revisions to have been made to Condition C.18 – General Reporting Requirements to reflect NSR (New Source Review) reform provisions at the major sources.

**C.6 Stack Height [326 IAC 1-7]**

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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 **by using ambient air quality modeling pursuant to 326 IAC 1-7-4.**

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

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- (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  
MC61-52 IGCN1003  
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 14-10-4-1, 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.**

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~thirty (30)~~ **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 ~~thirty (30)~~ **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  
MC61-53 IGCN1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ~~thirty (30)~~ **ninety (90)** day compliance schedule, with full justification of the reasons for the inability to meet this date.

C.18 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  
MC61-53 IGCN1003  
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) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.** Reporting periods are based on calendar years, **unless otherwise specified in this permit.** **For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

(f) **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.**

- (5) The facility description in Section D.1 has been updated to further define the units subject to the NESHAP Subpart WWWW and 326 IAC 20-56. Visible emissions notations are not required for the gelcoat and lamination tunnels. The NESHAP Subpart WWWW and 326 IAC 20-56 have been incorporated. Therefore, Conditions D.1.2, D.1.3, and D.1.13 have been removed, subsequent condition numbers changed, and the table of contents updated. Condition D.1.14 has been updated to reflect this change.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

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

### ~~D.1.2 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]~~

~~Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:~~

- ~~(a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.~~
- ~~(b) Except for mixing containers as described in item (g), HAP-containing materials shall be kept in a closed container when not in use.~~
- ~~(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.~~
- ~~(d) Solvent collection containers shall be kept closed when not in use.~~
- ~~(e) Clean-up rags with solvent shall be stored in closed containers.~~
- ~~(f) Closed containers shall be used for the storage of the following:~~
- ~~(1) All production and tooling resins that contain HAPs.~~
  - ~~(2) All production and tooling gel coats that contain HAPs.~~
  - ~~(3) Waste resins and gel coats that contain HAPs.~~
  - ~~(4) Cleaning materials, including waste cleaning materials.~~
  - ~~(5) Other materials that contain HAPs.~~

- ~~(g) — All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.~~

~~On and after April 21, 2006, when the source becomes subject to 326 IAC 20-56 and 40 CFR Part 63, Subpart WWW, the requirements of this condition and 326 IAC 20-25-4 will no longer be applicable to the fiberglass operations.~~

~~D.1.3 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]~~

~~Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule outlined in 326 IAC 20-25-8 until April 21, 2006 when the source becomes subject to 326 IAC 20-56:~~

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

~~D.1.13 Visible Emissions Notations~~

- ~~(a) — Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

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

~~D.1.14~~ **D.1.11** Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(b)(2), the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC and HAP emission limits before control. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used; and
  - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain the following training records:
  - (1) A copy of the current training program; and
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain the continuous temperature records for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain the daily records of the duct pressure, or fan amperage, or blower frequency range. **The Permittee shall include in its daily record when the duct pressure, or fan amperage, or blower frequency range reading is not taken and the reason for the lack of a duct pressure, or fan amperage, or blower frequency reading (e.g. the process did not operate that day).**
- (e) To document compliance with Conditions D.1.12, the Permittee shall maintain a log of weekly and monthly overspray observations, daily and monthly inspections.

- (f) ~~To document compliance with Condition D.1.13 the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.~~

**D.1.15D.1.12 Reporting Requirements**

- (a) A monthly summary of the information to document compliance with Condition D.1.1(b)(2) shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual **responsible official**" as defined by 326 IAC ~~2-1-2-4(4)~~ **2-7-1(34)**.
- (5) Section A.3 and Section D.2 have been modified to add the new insignificant activities to the facility description and the appropriate related limits and requirements. Since the sawing and grinding room, and the mill room by definition are not trimmers, Section A.3 and D.2, and Condition D.2.2 were modified. Also, the Table of Contents has been updated.

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

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

- (a) ~~Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone consisting of:~~
- ~~(1) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]~~
  - ~~(2) One (1) mill room (identified as EU4), equipped with two (2) panel saws (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]~~
  - ~~(3) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).~~
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (1) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]**
  - (2) One (1) mill room (identified as EU4), equipped with two (2) panel saws (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]**
  - (3) One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).**
  - (4) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.**

- (5) **One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.**

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) ~~Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone consisting of:~~
- (1) ~~One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]~~
  - (2) ~~One (1) mill room (identified as EU4), equipped with two (2) panel saw (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]~~
  - (3) ~~One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).~~
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (1) **One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]**
  - (2) **One (1) mill room (identified as EU4), equipped with two (2) panel saw (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]**
  - (3) **One (1) dust hog collector (identified as DCF1) used as a secondary unit (i.e. for backup to baghouse DC2 in case of bag failure).**
  - (4) **One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.**
  - (5) **One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3.**

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

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) rate from the trimmers shall not exceed ~~6.84 pounds per hour when operating at a process weight rate of 4,299 pounds per hour.~~ **insignificant activities shall be limited as shown in the following table.**

Insignificant Activity	PM Limit (lbs/hr)	Process Weight Rate of Operation (lbs/hr)
Grinding and machining operations EU 4 and EU5	6.84	4,299
Sawing and Grinding Room EU10	7.42	4,849
Mill Room EU9	5.20	2,850

The pound per hour limitation was calculated as follows:

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

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

**D.2.2 Minor Source Modifications [326 IAC 2-7-10.5(d)]**

Pursuant to 326 IAC 2-7-10.5(d)(4)(C) (Minor Source Modifications), the baghouse (identified as DC2) to be used in conjunction with the trimmers **grinding and machining operations** (consisting of one (1) saw and grinding room, **identified as EU5** and one (1) mill room, **identified as EU4**) will limit the PM and PM10 emissions from this process to less than 25 tons per year and shall comply with the following limits when the trimmers **grinding and machining operations** are in operation:

- (a) Operate with a control efficiency of at least 99%; and
- (b) Have no visible emissions.

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

**D.2.5 Visible Emissions Notations [326 IAC 2-7-1(21)(G)(xxx)]**

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

#### **D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) **The Permittee shall record the pressure drop across the baghouses used in conjunction with the grinding and machining operations at least once per day when the grinding and machining operations are in operation. When for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.**
- (b) **The instrument used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.**

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

##### **D.2.7 Record Keeping Requirements**

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- (a) **To document compliance with Condition D.2.2 and Condition D.2.5, the Permittee shall maintain a daily records of once per day visible emission notations of the baghouse (identified as DC2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (b) **To document compliance with D.2.6, the Permittee shall maintain a daily record of the pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

##### **D.2.8 Reporting Requirements**

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**A quarterly summary of the information to document compliance with Conditions D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (6) Section D.3 has been created to incorporate the new emission units and the table of contents was updated. Section A.2 has been updated as well.

#### **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) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for

VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

- (c) **Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (d) **One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

- (c) **Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (d) **One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

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

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

##### D.3.1 Emission Offset Minor Limit [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the volatile organic compound (VOC) emissions including VOC emissions from the gel coat tunnels (EU6 and EU7) and the lamination tunnel (EU8) shall be limited as follows:

- (a) **The overall VOC control efficiency for the thermal oxidizer, including capture and control efficiency, shall be no less than 95%.**
- (b) **The VOC input shall be limited such that the potential to emit (PTE) shall not exceed fifty four (54) tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

**Compliance with these limits and the limits in Condition D.1.1 shall ensure that the entire source does not exceed one hundred (100) tons of VOC per year and renders the requirements of 326 IAC 2-3, Emission Offset not applicable.**

**Compliance with these limits shall be determined based upon the equation in Condition D.3.6 and the following criteria:**

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.**
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. This reference is included with this permit. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene on an equivalent weight basis.**

#### **D.3.2 Operator Training [326 IAC 20-56]**

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- (a) Pursuant to 326 IAC 20-56, the Permittee shall train all new and existing personnel, including contract personnel who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:**
  - (1) All personnel hired shall be trained within thirty (30) days of hiring;**
  - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually; and**
  - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.**
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:**
  - (1) Appropriate application techniques;**
  - (2) Appropriate equipment cleaning procedures; and**
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.**
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:**
  - (1) A copy of the current training program; and**
  - (2) A list of the following:**
    - (A) All current personnel, by name, that are required to be trained; and**
    - (B) The date the person was trained or date of most recent refresher**

training, whichever is later.

- (d) Records of prior training programs and former personnel are not required to be maintained.

**D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the gel coat tunnels (EU6 and EU7) and the laminating tunnel (EU8) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications at all times that these units are in operation.

**D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.3.5 Testing Requirements [326 IAC 2 7 6(1),(6)] [326 IAC 2 1.1 11]**

In order to demonstrate compliance with Condition D.3.2, the Permittee shall conduct a performance test to verify VOC control efficiency to include capture and destruction efficiency, within sixty (60) days after achieving maximum production, but no later than one hundred eighty (180) days after initial start-up of emission units EU6, EU7, and EU8 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.3.6 Volatile Organic Compounds (VOC)**

Compliance with the Conditions D.3.2 shall be determined using the following calculation:

$$\text{VOC emissions (tons/month)} = \sum_{i=1}^n ((A_i * B_i) / 2000) * (UEF_i / 2000) * (1-C)$$

Where: n = no. of coatings used during the day

A<sub>i</sub> = Density (lb/gal resin or gel)

B<sub>i</sub> = Gallons of resin or gel used per month

C = Control efficiency of the thermal oxidizer (TO-2) (C = 95%)

UEF<sub>i</sub> = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)

i = type of resin or gel

2000 = conversion factor (lbs/ton)

**D.3.7 Thermal Oxidizer Temperature**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.3.2 as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

#### **D.3.8 Parametric Monitoring**

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- (a) The Permittee shall determine the appropriate duct pressure, or fan amperage, from the most recent valid stack test that demonstrates compliance with the limits in condition D.3.2 as approved by IDEM.
- (b) The duct pressure or fan amperage, shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

#### **D.3.9 Volatile Organic Compound (VOC) Control**

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In order to demonstrate compliance with D.3.1, the VOC emissions from the gel coat tunnels (EU6 and EU7) and the laminating tunnel (EU8) shall be controlled by the thermal oxidizer (VECD2) at all times that these units are in operation.

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

#### **D.3.10 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack TO-2 while the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### **D.3.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC emission limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used; and

- (4) **Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.**
- (b) **To document compliance with Condition D.3.3, the Permittee shall maintain the following training records:**
  - (1) **A copy of the current training program; and**
  - (2) **A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**
- (c) **To document compliance with Condition D.3.7, the Permittee shall maintain the continuous temperature records for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.**
- (d) **To document compliance with Condition D.3.8, the Permittee shall maintain the daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when the duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).**
- (e) **To document compliance with Conditions D.3.10, the Permittee shall maintain a log of weekly and monthly overspray observations, daily and monthly inspections.**
- (f) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **D.3.12 Reporting Requirements**

**A monthly summary of the information to document compliance with Condition D.3.1 and Condition D.3.2 shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (7) The facility description in Section E.1 was updated with the new emission units that are subject to the NESHAP.

### **SECTION E.1 SOURCE OPERATION CONDITIONS**

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. **Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

- (c) **Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**
- (d) **One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]**

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

- (8) Condition E.1.2 has been changed in order to incorporate revisions to the NESHAP.

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

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

- ~~(a) If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous laminating/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.~~
- (b) **All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.**

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

- (a) You must submit each report in Table 14 to this subpart that applies to you.
- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
  - (1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.
  - (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.
  - (3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

- (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - (5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
- (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
- (1) Company name and address.
  - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (3) Date of the report and beginning and ending dates of the reporting period.
  - (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
  - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
  - (6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.
- (d) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The total operating time of each affected source during the reporting period.
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (e) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (4) of this section and in paragraphs (e)(1) through (12) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The date and time that each malfunction started and stopped.

- (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (3) The date, time, and duration that each CMS was out of control, including the information in §63.8(c)(8).
  - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.
  - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
  - (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - (8) An identification of each organic HAP that was monitored at the affected source.
  - (9) A brief description of the process units.
  - (10) A brief description of the CMS.
  - (11) The date of the latest CMS certification or audit.
  - (12) A description of any changes in CMS, processes, or controls since the last reporting period.
- (f) **You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).**
- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.
- (i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

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

For ...	You must ...
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For ...	You must ...
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
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.
6. all mixing or BMC manufacturing operations <sup>1</sup>	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations <sup>1</sup>	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations <sup>1</sup>	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

For ...	You must ...
<p><b>9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement</b></p>	<p><b>i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s),</b>  <b>ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device,</b>  <b>iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),</b>  <b>iv. direct any compressed air exhausts away from resin and wet-out area(s),</b></p>
	<p><b>v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air,</b>  <b>vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and</b>  <b>vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.</b></p>

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

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

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

If your facility has the following resin type and application method	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, you can use for.	Is . . .
7. Tooling resins, nonatomized mechanical.	Tooling manual.....	91.4
8. Tooling resins, manual mechanical.	Tooling atomized.....	45.9

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

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

content based on a 12-month rolling average is less than or equal to the values shown the following table:

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

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
1. CR/HS resins, centrifugal casting <sup>1,2</sup>	a. CR/HS mechanical	<sup>3</sup> 48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	<sup>3</sup> 45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting <sup>1,2</sup>	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting <sup>1,2</sup>	38.5
6. non-CR/HS resins, centrifugal casting <sup>1,2</sup>	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

<sup>1</sup>If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

<sup>2</sup>If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

<sup>3</sup>Nonatomized mechanical application must be used.

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

For . . .	That must meet the following standard . . .	You have demonstrated initial compliance if . . .
2. A new or existing cleaning	Not use cleaning solvents that contain HAP, except that	The owner or operation operator submits a certified statement in the

	styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment.	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.
	Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	
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 containing 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 removal of storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

**Table 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 . . .
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders,	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader,

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
	no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	hoppers are closed except when adding materials, and materials are recovered after slitting.
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.
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.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	<ul style="list-style-type: none"> <li>i. Not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s),</li> <li>ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device,</li> <li>iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),</li> <li>iv. direct any compressed air exhausts away from resin and wet-out area(s),</li> <li>v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air,</li> <li>vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and</li> <li>vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.</li> </ul>	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

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:

---

You must submit. .

If your facility		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).
3. Qualifies for a compliance extension as specified in § 63.9(c).	A request for a compliance extension as specified in § 63.9(c).	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in § 63.9(h).	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device.	a. A notification of intent to conduct a performance test as specified in § 63.9(e).	No later than the date specified in § 63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in § 63.9(g).	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in § 63.9(h).	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

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

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

<b>If your facility . . .</b>	<b>You must submit . . .</b>	<b>By this date . . .</b>
<b>1. Is an existing source subject to this subpart</b>	<b>An Initial Notification containing the information specified in §63.9(b)(2)</b>	<b>No later than the dates specified in §63.9(b)(2).</b>
<b>2. Is a new source subject to this subpart</b>	<b>The notifications specified in §63.9(b)(4) and (5)</b>	<b>No later than the dates specified §63.9(b)(4) and (5).</b>
<b>3. Qualifies for a compliance extension as specified in §63.9(c)</b>	<b>A request for a compliance extension as specified in §63.9(c)</b>	<b>No later than the dates specified in §63.6(i).</b>
<b>4. Is complying with organic HAP emissions limit averaging provisions</b>	<b>A Notification of Compliance Status as specified in §63.9(h)</b>	<b>No later than 1 year plus 30 days after your facility's compliance date.</b>
<b>5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging</b>	<b>A Notification of Compliance Status as specified in §63.9(h)</b>	<b>No later than 30 calendar days after your facility's compliance date.</b>
<b>6. Is complying by using an add-on control device</b>	<b>a. A notification of intent to conduct a performance test as specified in §63.9(e)</b>	<b>No later than the date specified in §63.9(e).</b>
	<b>b. A notification of the date for the CMS performance evaluation as specified in §63.9(g)</b>	<b>The date of submission of notification of intent to conduct a performance test.</b>
	<b>c. A Notification of Compliance Status as specified in §63.9(h)</b>	<b>No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.</b>

(9) The Quarterly Report for Emission Units EU1, EU2, and EU3 was updated to clarify the emission units and a Quarterly Report was created for Emission Units EU6, EU7, and EU8.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Noble Composites, Inc.  
 Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
 Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
 Part 70 Permit No.: T039-16024-00556

Facility: Fiberglass panel manufacturing unit (EU1, EU2, and EU3)  
Parameter: VOC/HAP Emissions before control

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Noble Composites, Inc.  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Mailing Address: 100 First Stamford Place, Stamford, Connecticut 06902  
Part 70 Permit No.: T039-16024-00556  
Facility: Fiberglass panel manufacturing unit (EU6, EU7, and EU8)  
Parameter: VOC Emissions  
Limit: Fifty four (54) tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**Conclusion and Recommendation**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-24568-00556 and Significant Permit Modification No. 039-24638-00556. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

**IDEM Contact**

Questions regarding this proposed permit can be directed to Robert Henry at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC61-53 IGCN1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.

**Appendix A: Emission Calculations****Company Name: Noble Composites, Inc.****Address City IN Zip: 2424 East Kercher Road, Goshen, Indiana 46526****Significant Source Modification: 039-24568-00556****Significant Permit Modification: 039-24638-00556****Reviewer: Robert Henry****Date: November 21, 2007**

<b>TANKS Summary</b>	<b>PTE in tons/yr</b>
Styrene - T3	0.032
Styrene - T4	0.032
Total for Tanks	0.064

<b>Pollutant</b>	<b>Uncontrolled PTE (tons/year)</b>	<b>Controlled PTE (tons/year)</b>
PM	47.272	1.280
PM-10	47.701	1.709
VOC	668.255	40.094
NOx	4.687	4.687
SO2	0.045	0.045
CO	6.328	6.328
Highest Individual HAP - Styrene	577.169	28.858
Combined HAPs	662.446	34.285



**Appendix A: Emission Calculations**  
**Reinforced Plastics and Composites Open Molding Operations**  
**HAPs Emissions**  
**Emissions from two gelcoat tunnels (EU6 and EU7) and one laminating tunnel (EU8)**  
**Company Name: Noble Composites, Inc.**  
**Address City IN Zip: 2424 East Kercher Road, Goshen, Indiana 46526**  
**Significant Source Modification: 039-24568-00556**  
**Significant Permit Modification: 039-24638-00556**  
**Reviewer: Robert Henry**  
**Date: November 21, 2007**

Unit ID	Application Method	Coatings	Density (Lb/Gal)	Maximum Use (Gal/Part)	Material Use (Lb/Part)	Maximum Production Rate (Parts/hr)	Maximum Usage (lbs/hr)	Weight % Styrene	*Emission Factor for Styrene (lbs/ton)	PTE of Styrene (tons/yr)	Weight % MMA**	*Emission Factor for MMA (lbs/ton)	PTE of MMA (tons/yr)	PTE of Combined HAPs (tons/yr)
EU6	Gelcoat Application (controlled spray)	403 White NPG Gelcoat	10.84	2.36	25.59	10.00	255.87	35.00%	245	137.288	5.00%	75	42.027	179.315
EU7	Gelcoat Application (controlled spray)	403 White NPG Gelcoat	10.84	2.36	25.59	10.00	255.87	35.00%	245	137.288	5.00%	75	42.027	179.315
EU8	Resin Application (Mechanical Atomized Controlled spray)	COR61-A-C-812 Resin	10.84	11.80	127.94	10.00	1279.36	35.00%	108.0	302.593	0.00%	0	0.000	302.593
<b>Total</b>										<b>577.169</b>			<b>84.054</b>	<b>661.222</b>
<b>***Total PTE after Control (tons/yr)</b>										<b>28.858</b>			<b>4.203</b>	<b>33.061</b>

\* Emission factors for resin and gelcoat are based on "Unified Emission Factors for Opening Molding of Composites" (Jul 23, 2001) and the units are pounds per ton of resin/gel coat processed.

\*\*MMA (Methyl Methacrylate CAS#80-62-6)

\*\*\*HAP emissions from these units will be controlled by a regenerative thermal oxidizer (TO-2) with an overall control efficiency of 95%

**METHODOLOGY**

Material Use (lb/part) = Material Use (gal/part) x Density (lb/gal)

Maximum Usage (lb/hr) = Material Use (lb/part) x Production Rate (part/hr)

HAPs emission rate (tons/yr) = Max. Usage (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs x Emission Factor (lb/ton) x 1 tons/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Gelcoat Tunnels EU6 and EU7 and Laminating Tunnel EU8**  
**Company Name: Noble Composites, Inc.**  
**Address : 2424 East Kercher Road, Goshen, Indiana 46526**  
**Significant Source Modification: 039-24568-00556**  
**Significant Permit Modification: 039-24638-00556**  
**Plt ID: 039-00556**  
**Reviewer: Robert Henry**  
**Date: November 21, 2007**

Material	Density (Lb/Gal)	Gals of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Weight % VOC	*VOC Emission Factor (lbs/ton)	Pounds VOC per gallon of coating	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	Potential VOC Before Controls (tons/year)	VOC Control Efficiency (%) Using RTO	Potential VOC After Controls (tons/yr)	Volume % Non-Volatiles (solids)	Potential PM/PM10 before Controls (ton/yr)	Control Efficiency (%) Using Dry Filters	Potential PM/PM10 after Controls (tons/yr)	Transfer** Efficiency
<b>Operations*</b>																	
Noble White Gelcoat (EU6)	10.84	2.36	10.00	255.87	40.00%	320.00	3.96	40.939	982.545	179.315	0.950	8.966	0.600	6.724	95.00%	0.336	99.0%
Noble White Gelcoat (EU7)	10.84	2.36	10.00	255.87	40.00%	320.00	3.96	40.939	982.545	179.315	0.950	8.966	0.600	6.724	95.00%	0.336	99.0%
COR61-A-C-812 (EU8)	10.84	11.80	10.00	1279.36	35.00%	108.00	3.63	69.085	1658.045	302.593	0.950	15.130	0.650	0.000	95.00%	0.000	100.0%
<b>Potential Emissions</b>							<b>Totals</b>	<b>150.964</b>	<b>3623.136</b>	<b>661.222</b>		<b>33.061</b>		<b>13.449</b>		<b>0.672</b>	

\*VOC emissions are based on Unified Emission Factor (UEF) of Styrene and MMA.

\*\*Transfer efficiency assumed to be 99% for EU6 and EU7, and 100% for EU8. This assumption is based on information provided by the source during the Significant Permit Modification No.: 039-19630-00556.

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (Volume % Non-Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**PM/PM10 Emissions from Mill Room Woodworking EU9A/B/C**  
**Company Name: Noble Composites, Inc.**  
**Address City IN Zip: 2424 East Kercher Road, Goshen, Indiana 46526**  
**Permit Modification: 039-24568-00556**  
**Significant Source Modification: 039-24568-00556**  
**Significant Permit Modification: 039-24638-00556**  
**Reviewer: Robert Henry**  
**Date: November 21, 2007**

Operations	Unit ID	Equipment	Stack ID	Air Flow Rate	Outlet Grain	Before Control		After Control		Control Efficiency (%)
				Baghouse (acfm)	Loading (gr/dscf)	PTE of PM/PM10 (lbs/hr)	(tons/yr)	PTE of PM/PM10 (lbs/hour)	(tons/year)	
Mill Room	EU9A	Holzher Panel Saw	Baghouse (DC3)	10,000	0.000437	0.832	3.646	0.037	0.164	95.5%
	EU9B	Holzher Panel Saw								
	EU9C	Timesavers Panel Sander								

Assume all PM emissions are equal to PM10.

**METHODOLOGY**

**After Control**

PTE of PM/PM10 (lbs/hour) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains

PTE of PM/PM10 (tons/year) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains \* 8760 hours/year \* 1 ton/2000 lbs

**Before Control**

PTE of PM/PM10 (tons/year) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains \* 8760 hours/year \* 1 ton/2000 lbs \* 1/(1-Control Efficiency %)

**Process Weight Rule,  $E=4.10 \cdot P(\text{tons/hour})^{0.67}$**

Before Control PM (lb/hr)	After Control PM (lb/hr)	Process Weight Rate (P) (tons/hour)	Equivalent PM Limit (E) (lbs/hour)
3.65	0.16	1.425	5.20

**Appendix A: Emission Calculations**  
**PM/PM10 Emissions from Saw and Grinding Room EU10A/B/C/D**  
**Company Name: Noble Composites, Inc.**  
**Address City IN Zip: 2424 East Kercher Road, Goshen, Indiana 46526**  
**Significant Source Modification: 039-24568-00556**  
**Significant Permit Modification: 039-24638-00556**  
**Plt ID: 039-00556**  
**Reviewer: Robert Henry**  
**Date: November 21, 2007**

Operations	Unit ID	Equipment	Stack ID	Air Flow Rate	Outlet Grain	Before Control		After Control		Control Efficiency (%)
				Baghouse (acfm)	Loading (gr/dscf)	PTE of PM/PM10 (lbs/hour)	PTE of PM/PM10 (tons/year)	PTE of PM/PM10 (lbs/hour)	PTE of PM/PM10 (tons/year)	
Sawing and Grinding Room	EU10A	Hendricks Panel Saw	DC4	8,000	0.001	6.857	30.034	0.069	0.300	99.0%
	EU10B	Graco Table Saw								
	EU10C	Four Ingersol Hand Grinders								
	EU10D	Holzher Panel Saw								

Assume all PM emissions are equal to PM10.

The baghouse specifications for DC1 are from Page 3 of 3, TSD Appendix A for permit no.: 039-16024-00556, issued April 23, 2003.

**METHODOLOGY**

**After Control**

PTE of PM/PM10 (lbs/hour) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains

PTE of PM/PM10 (tons/year) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains \* 8760 hours/year \* 1 ton/2000 lbs

**Before Control**

PTE of PM/PM10 (tons/year) = Air Flow Rate (acfm) \* Outlet Grain Loading (gr/dscf) \* 60 minutes/hour \* 1 lb/7000 grains \* 8760 hours/year \* 1 ton/2000 lbs \* 1/(1-Control Efficiency %)

**Process Weight Rule,  $E=4.10 \cdot P^{0.67}$**

Before Control PM (lb/hr)	After Control PM (lb/hr)	Process Weight Rate (P) (tons/hour)	Equivalent PM Limit (E) (lbs/hour)
6.86	0.069	2.424	7.42



**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 RTO Combustion**

**Company Name:** Noble Composties, Inc.  
**Address City IN Zip:** 2424 East Kercher Road, Goshen, IN 46526  
**Significant Source Modification:** 039-24568-00556  
**Significant Permit Modification:** 039-24638-00556  
**Plt ID:** 039-00556  
**Reviewer:** Robert Henry  
**Date:** November 21, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

13.0

113.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.108	0.433	0.034	2.847	0.313	4.783

\*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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**RTO Combustion**

**HAPs Emissions**

**Company Name: Noble Composties, Inc.**

**Address City IN Zip: 2424 East Kercher Road, Goshen, IN 46526**

**Significant Source Modification: 039-24568-00556**

**Significant Permit Modification: 039-24638-00556**

**Plt ID: 039-00556**

**Reviewer: Robert Henry**

**Date: November 21, 2007**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.00012	0.00007	0.00427	0.10249	0.00019

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.00003	0.00006	0.00008	0.00002	0.00012

Total HAPs for this unit 0.1075

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 For All Heaters**

**Company Name:** Noble Composties, Inc.  
**Address City IN Zip:** 2424 East Kercher Road, Goshen, IN 46526  
**Significant Source Modification:** 039-24568-00556  
**Significant Permit Modification:** 039-24638-00556  
**Plt ID:** 039-00556  
**Reviewer:** Robert Henry  
**Date:** November 21, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.2

36.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.035	0.140	0.011	1.840	0.101	1.545

\*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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**For All Heaters**

**HAPs Emissions**

**Company Name: Noble Composties, Inc.**

**Address City IN Zip: 2424 East Kercher Road, Goshen, IN 46526**

**Significant Source Modification: 039-24568-00556**

**Significant Permit Modification: 039-24638-00556**

**Plt ID: 039-00556**

**Reviewer: Robert Henry**

**Date: November 21, 2007**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.00004	0.00002	0.00138	0.03311	0.00006

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.00001	0.00002	0.00003	0.00001	0.00004

Total HAPs for this unit 0.0347

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.