



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: November 15, 2007
RE: H. R. O., Inc. / 087-24705-00051
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**H.R.O., Inc., dba Owens Technology
200 East Vine Street
Wolcottville, Indiana 46795**

(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.: T087-24705-00051	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 15, 2007 Expiration Date: November 15, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fiberglass manufacturing plant that produces boat and cargo trailer components.

Source Address:	200 East Vine Street, Wolcottville, Indiana 46795
Mailing Address:	PO Box 315, Wolcottville, Indiana 46795
General Source Phone Number:	260-854-2772
SIC Code:	3732
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) resin flowcoat booth, identified as FC1S, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 parts per hour, and sources of fugitive emissions. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (b) One (1) gelcoat booth, identified as SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 4.0 parts per hour, using dry filters as particulate control, with emissions exhausted to stack SV2W. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T087-24705-00051, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

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

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

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

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

- (a) All terms and conditions of permits established prior to T087-24705-00051 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

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]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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).

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) resin flowcoat booth, identified as FC1S, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 parts per hour, and sources of fugitive emissions. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (b) One (1) gelcoat booth, identified as SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 4.0 parts per hour, using dry filters as particulate control, with emissions exhausted to stack SV2W. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

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

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

D.1.1 Reinforced Plastics Composites Production [326 IAC 20-56-2]

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

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating 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 (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 employees.
- (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 the most recent

refresher training, whichever is later.

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

D.1.2 Volatile Organic Compounds - BACT [326 IAC 8-1-6]

Pursuant to the BACT determination in T087-14534-00051, issued January 13, 2003, and 326 IAC 8-1-6, the flowcoat and gelcoat Booths (FC1S and SB2W) shall comply with the following operating conditions:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months with compliance determined at the end of each month.
- (b) The following categories of materials in section D.1.5(b) shall be applied using mechanical nonatomized application technology or manual application:
 - (i) Production noncorrosion resistant, unfilled resins from all sources.
 - (ii) Production, specialty product resins from all sources.
 - (iii) Tooling resins used in the manufacture of watercraft.
 - (iv) Production resin used for Class I flame and smoke products.

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

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

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

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

- (c) Unless specified in subsection D.1.5(b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
 - (i) Nonatomized application technology.

- (ii) Air-assisted airless.
- (iii) Airless.
- (iv) High volume, low pressure (HVLP).
- (v) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The listed work practices shall be followed:

- (i) Cleaning operations for resin and gel coat application equipment:
 - (I) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment. To the extent possible the cleaning solvent used shall also be a non-VOC solvent.
 - (II) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (III) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (ii) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (iii) Except for mixing containers as described in item (8), HAP and VOC containing materials shall be kept in a closed container when not in use.
- (iv) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (v) Solvent collection containers shall be kept closed when not in use.
- (vi) Clean-up rags with solvent shall be stored in closed containers.
- (vii) Closed containers shall be used for the storage of the following:
 - (I) All production and tooling resins that contain HAPs.
 - (II) All production and tooling gel coats that contain HAPs.
 - (III) Waste resins and gel coats that contain HAPs.
 - (IV) Cleaning materials, including waste cleaning materials.
 - (V) Other materials that contain HAPs.

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

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

- (a) To determine compliance with Condition D.1.2, the VOC usage and HAP monomer content limitations shall be determined by one of the following:
 - (1) The manufacturer's certified product data sheet.
 - (2) The manufacturer's material safety data sheet.
 - (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A, 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.
 - (B) 40 CFR 63, Method 311, Appendix A, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (4) An alternate method approved by IDEM, OAQ.
- (b) Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques 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 monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission

Factors for Open Molding of Composites,” Composites Fabricators Association, July 2001, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes 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) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Pigmented	37
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Pigmented	34

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (4).

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

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

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

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

*Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer*

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

D.1.6 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 stacks SV1E and SV2W 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 deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records of the gel coat and resin usage. Records shall be taken monthly and shall be complete and

sufficient to establish compliance with the usage limits and/or the volatile organic HAP emission limits established in Condition D.1.2.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2 shall be submitted to the addresses 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).

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements: Reinforced Plastic Composites Production [326 IAC 20-56] [40 CFR Part 63, Subpart WWWW]

D.1.9 General Provisions Relating to the NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (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, for the resin flowcoat booth identified as FC1S, the gelcoat booth identified as SB2W, and all activities associated with the production of plastic composites as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63, Subpart WWWW.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and

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100 North Senate Avenue
MC 61-53 IGCN 1003
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D.1.10 NESHAP Requirements: Reinforced Plastic Composites Production [40 CFR Part 63, Subpart WWWW] [326 IAC 20-56]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW as follows:

What This Subpart Covers

§ 63.5780 What is the purpose of this subpart?

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

§ 63.5785 Am I subject to this subpart?

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

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

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

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

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

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

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

- (a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
- (b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
- (c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

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

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

Compliance Dates and Standards

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

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

General Compliance Requirements

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

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

Testing and Initial Compliance Requirements

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

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

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

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

Continuous Compliance Requirements

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

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

Notifications, Reports, and Records

§ 63.5905 What notifications must I submit and when?

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

§ 63.5915 What records must I keep?

- (a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.
 - (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
- (c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart.
- (d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

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

- (a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).
- (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

- (c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.
- (d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Other Requirements and Information

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

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

§ 63.5930 Who implements and enforces this subpart?

- (a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.
- (b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.
- (c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:
 - (1) Approval of alternatives to the organic HAP emissions standards in §63.5805 under §63.6(g).
 - (2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.
 - (3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.
 - (4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.5935 What definitions apply to this subpart?

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

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

Bulk molding compound (BMC) means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and

reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composites products.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Corrosion-resistant resin means a resin that either:

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

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

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin

application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

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

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

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

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

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

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

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

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

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

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

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

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

Low Flame Spread/Low Smoke Products means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application

products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than or equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table 4 to Subpart WWWW of Part 63_Work Practice Standards

For . . .	You must . . .
2. a new or existing cleaning operation.	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation.	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation.	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation.	use a nylon containing film to enclose SMC.

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards
 As specified in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

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

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

necessary for
safety.

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.

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

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

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

Table 15 to Subpart WWWW of Part 63—Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

As specified in §63.5925, the parts of the General Provisions which apply to you are shown in the following table:

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

	part after a relevant standard has been set under this part.		clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§ 63.1(c)(2).....	Title V operating permit requirement.	Yes.....	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§ 63.1(c)(3) and (4).....	Reserved.....	No.....	
§ 63.1(c)(5).....	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes.....	
§ 63.1(d).....	Reserved.....	No.....	
§ 63.1(e).....	Applicability of permit program before a relevant standard has been set under this part.	Yes.....	
§ 63.2.....	Definitions.....	Yes.....	Subpart WWWW of Part 63 defines terms in § 63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
§ 63.3.....	Units and abbreviations	Yes.....	Other units and abbreviations used in subpart WWWW of Part 63 are defined in

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

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

	maintenance requirements.		
§ 63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping.	Yes	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§ 63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction.	No	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
§ 63.6(f)(2) and (3)	Methods for determining compliance.	Yes	
§ 63.6(g)(1) through (3)	Alternative standard...	Yes	
§ 63.6(h)	Opacity and visible emission Standards.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§ 63.6(i)(1) through (14)	Compliance extensions..	Yes	
§ 63.6(i)(15)	Reserved.....	No	
§ 63.6(i)(16)	Compliance extensions..	Yes	
§ 63.6(j)	Presidential compliance exemption.	Yes	
§ 63.7(a)(1)	Applicability of performance testing requirements.	Yes	
§ 63.7(a)(2)	Performance test dates.	No	Subpart WWWW of Part 63 initial compliance requirements are in § 63.5840.
§ 63.7(a)(3)	CAA Section 114 authority.	Yes	
§ 63.7(b)(1)	Notification of performance test.	Yes	
§ 63.7(b)(2)	Notification rescheduled	Yes	

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

§ 63.8(c)(2) and (3).....	Monitoring system installation.	Yes.....	limit. This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(c)(4).....	CMS requirements.....	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(c)(5).....	Continuous Opacity Monitoring System (COMS) minimum procedures.	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.8(c)(6) through (8).....	CMS calibration and periods CMS is out of control.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(d).....	CMS quality control program, including test plan and all previous versions.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(1).....	Performance evaluation of CMS.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(2).....	Notification of performance evaluation.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(3) and (4).....	CMS requirements/	Yes.....	This section applies if

	alternatives.		you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(5)(i)	Reporting performance evaluation results.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(5)(ii)	Results of COMS performance evaluation.	No	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.8(f)(1) through (3)	Use of an alternative monitoring method.	Yes	
§ 63.8(f)(4)	Request to use an alternative monitoring method.	Yes	
§ 63.8(f)(5)	Approval of request to use an alternative monitoring method.	Yes	
§ 63.8(f)(6)	Request for alternative to relative accuracy test and associated records.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(g)(1) through (5)	Data reduction	Yes	
§ 63.9(a)(1) through (4)	Notification requirements and general information.	Yes	
§ 63.9(b)(1)	Initial notification applicability.	Yes	
§ 63.9(b)(2)	Notification for affected source with initial startup before effective date of standard.	Yes	
§ 63.9(b)(3)	Reserved	No	
§ 63.9(b)(4)(i)	Notification for a new or reconstructed major	Yes	

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

§ 63.9(g)(1).....	Additional notification requirements for sources using CMS.	Yes.....	emission standards. This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.9(g)(2).....	Notification of compliance with opacity emission standard.	No.....	Subpart WWWW of Part 63 does not contain opacity emission standards.
§ 63.9(g)(3).....	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded.	Yes.....	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.9(h)(1) through (3).....	Notification of compliance status.	Yes.....	
§ 63.9(h)(4).....	Reserved.....	No.....	
§ 63.9(h)(5) and (6).....	Notification of compliance status.	Yes.....	
§ 63.9(i).....	Adjustment of submittal deadlines.	Yes.....	
§ 63.9(j).....	Change in information provided.	Yes.....	
§ 63.10(a).....	Applicability of recordkeeping and reporting.	Yes.....	
§ 63.10(b)(1).....	Records retention.....	Yes.....	
§ 63.10(b)(2)(i) through (v)....	Records related to startup, shutdown, and malfunction.	Yes.....	Only applies to facilities that use an add-on control device.
§ 63.10(b)(2)(vi) through (xi)..	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance	Yes.....	

	evaluations.		
§ 63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting.	Yes	
§ 63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test.	Yes	
§ 63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status.	Yes	
§ 63.10(b)(3)	Records for applicability determinations.	Yes	
§ 63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(c)(2) through (4)	Reserved	No	
§ 63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(c)(9)	Reserved	No	
§ 63.10(c)(10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(d)(1)	General reporting requirements.	Yes	
§ 63.10(d)(2)	Report of performance test results.	Yes	
§ 63.10(d)(3)	Reporting results of opacity or visible emission observations.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.

§ 63.10(d)(4).....	Progress reports as part of extension of compliance.	Yes.....	
§ 63.10(d)(5).....	Startup, shutdown, and malfunction reports.	Yes.....	Only applies if you use an add-on control device.
§ 63.10(e)(1) through (3).....	Additional reporting requirements for CMS.	Yes.....	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§ 63.10(e)(4).....	Reporting COMS data....	No.....	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.10(f).....	Waiver for recordkeeping or reporting.	Yes.....	
§ 63.11.....	Control device requirements.	Yes.....	Only applies if you elect to use a flare as a control device.
§ 63.12.....	State authority and delegations.	Yes.....	
§ 63.13.....	Addresses of State air pollution control agencies and EPA Regional Offices.	Yes.....	
§ 63.14.....	Incorporations by reference.	Yes.....	
§ 63.15.....	Availability of information and confidentiality.	Yes.....	

D.1.11 One Time Deadlines Relating to NESHAP WWWW

- (a) The Permittee must conduct the performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by April 21, 2006.

- (b) A notification of compliance status shall be submitted as follows:
 - (1) If complying with organic HAP emissions limit average provisions, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2007.

 - (2) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limits other than organic HAP emissions limit averaging, the Permittee must submit a notification of compliance status on or before the close of business on May 21, 2006.

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

Source Name: H.R.O., Inc., dba Owens Technology
Source Address: 200 East Vine Street, Wolcottville, Indiana 46795
Mailing Address: PO Box 315, Wolcottville, Indiana 46795
Part 70 Permit No.: T087-24705-00051

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
MC61-50
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: H.R.O., Inc., dba Owens Technology
Source Address: 200 East Vine Street, Wolcottville, Indiana 46795
Mailing Address: PO Box 315, Wolcottville, Indiana 46795
Part 70 Permit No.: T087-24705-00051

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: H.R.O., Inc., dba Owens Technology
 Source Address: 200 East Vine Street, Wolcottville, Indiana 46795
 Mailing Address: PO Box 315, Wolcottville, Indiana 46795
 Part 70 Permit No.: T087-24705-00051
 Facility: Flowcoat and gelcoat booths
 Parameter: Gel Coat and Resin Usage per Condition D.1.2
 Limit: Less than 100 tons per twelve (12) consecutive months

QUARTER :

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: H.R.O., Inc., dba Owens Technology
 Source Address: 200 East Vine Street, Wolcottville, Indiana 46795
 Mailing Address: PO Box 315, Wolcottville, Indiana 46795
 Part 70 Permit No.: T087-24705-00051

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: H.R.O., Inc., dba Owens Technology
Source Location: 200 E. Vine Street, Wolcottville, Indiana 46795
County: LaGrange
SIC Code: 3732
Operation Permit No.: T087-24705-00051
Permit Reviewer: Stephanie Wilkerson

On September 11, 2007, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard in LaGrange, Indiana, stating that H.R.O., Inc., dba Owens Technology had applied for a Title V renewal for a stationary fiberglass manufacturing plant that produces boat and cargo trailer components. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

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

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

OAQ Change:

After further review, the OAQ has discovered that a permit section was inadvertently repeated. This section has been removed as follows:

D.1.11 One Time Deadlines Relating to NESHAP WWWW

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

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

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

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

For You must

2. a new or existing cleaning operation. ~~not use cleaning solvents that contain HAP, except that styrene may~~
be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

3. a new or existing materials storage operation. ~~keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.~~

4. an existing or new SMC manufacturing operation. ~~close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.~~

5. an existing or new SMC manufacturing operation. ~~use a nylon containing film to enclose SMC.~~

Table 9 to Subpart WWW 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 WWW of Part 63_Initial Compliance With Work Practice

	Standards
-	-
	You have
	That must meet the demonstrated
For . . .	following initial
compliance	standards . . . 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.
status	the owner or operator submits a certified statement in the notice of compliance that all materials, styrene in closed systems, or materials used clean cured from application equipment, contain no HAP.
cleaning	
except	
contained	
to	
resin	
-	-
3. a new or existing materials storage operation.	keep containers that store HAP containing materials closed or covered except during the
status	the owner or operator submits a certified statement in the notice of compliance

~~addition or that all HAP-~~
~~removal of containing~~
~~materials. Bulk storage~~
~~HAP containing containers are~~
~~materials storage kept closed or~~
~~tanks may be covered except~~
~~vented as when adding or~~
~~necessary for removing~~
~~safety. materials, and~~
~~that any bulk~~
~~storage tanks~~
are

~~vented only as~~
~~necessary for~~
~~safety.~~

~~4. an existing or new SMC close or cover the the owner or~~
~~manufacturing operation. resin delivery operator submits~~
~~system to the a certified~~
~~doctor box on statement in the~~
~~each SMC notice of~~
~~manufacturing compliance~~
status

~~machine. The that the resin~~
~~doctor box itself delivery system~~
~~may be open. is closed or~~
~~covered.~~

~~5. an existing or new SMC use a nylon the owner or~~
~~manufacturing operation. containing film operator submits~~
~~to enclose SMC. a certified~~
~~statement in the~~
~~notice of~~
~~compliance~~
status

~~that a nylon-~~
~~containing film~~
~~is used to~~
~~enclose SMC.~~

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	H.R.O., Inc., dba Owens Technology
Source Location:	200 E. Vine Street, Wolcottville, Indiana 46795
County:	LaGrange
SIC Code:	3732
Permit Renewal No.:	T087-24705-00051
Permit Reviewer:	Stephanie Wilkerson

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from H.R.O., Inc., dba Owens Technology relating to the operation of a stationary fiberglass manufacturing plant that produces boat and cargo trailer components.

History

On May 1, 2007, H.R.O., Inc. dba Owens Technologies submitted an application to the OAQ requesting to renew its operating permit. H.R.O., Inc. dba Owens Technologies was issued a Part 70 Operating Permit, T087-14534-00051, on January 31, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) resin flowcoat booth, identified as FC1S, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 parts per hour, and sources of fugitive emissions. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (b) One (1) gelcoat booth, identified as SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 4.0 parts per hour, using dry filters as particulate control, with emissions exhausted to stack SV2W. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

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

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

Emission Units and Pollution Control Equipment Removed From the Source

At the time of permit renewal, the following emission units identified in the original permit and subsequent modification have been removed from the facility:

- (a) One (1) gelcoat booth, identified as SB2W, was removed from the facility.
- (b) One (1) flowcoat booth, identified as FC1S, was removed from the facility.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Refractory storage not requiring air pollution control equipment.
- (c) Equipment used exclusively for packaging greases or lubricants.
- (d) Application of greases, lubricants, nonvolatile materials, or oils as temporary protective coatings.
- (e) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment.
- (f) Closed loop heating and cooling systems.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Heat exchanger cleaning and repair.
- (i) Blowdown for any of the following: sight glass, boilers, compressors, pumps, and cooling towers.
- (j) 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 three one-hundredths grains per actual cubic foot (0.03 gr/acf) and a gas flow rate less than or equal to four thousand actual cubic feet per minute (4000 acf/min), including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (k) Mold release agents using low volatile products (vapor pressure less than or equal to two kilo Pascals (2kPa) measured at thirty-eight degrees Centigrade (38°C).

Existing Approvals

Since the issuance of the Part 70 Operating Permit 087-14534-00051 on January 1, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 087-20740-00051 issued on August 22, 2005; and
- (b) Significant Permit Modification No. 087-21883-00051 issued on April 28, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV2W	SB2W	20	2	10,000	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in LaGrange County

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) LaGrange County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	42.65
PM-10	42.65
SO ₂	0.00
VOC	66.37
CO	0.00
NO _x	0.00

HAPs	tons/year
Styrene	57.00
Methyl Methacrylate	8.56
Total	65.56

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	4.284
CO	-
NO _x	-
HAP (Styrene)	0.437
HAP (Methyl Methacrylate)	3.847

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

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

Process/Emission Unit	Potential to Emit (tons/year)							
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs (Styrene)	HAPs (combined)
Gelcoat Booth	42.65	42.65	-	41.00	-	-	31.63	40.19
Flowcoat Booth	Neg.*	Neg.*	-	25.37	-	-	25.37	25.37
Total Emissions	42.65	42.65	-	66.37	-	-	57.00	65.56
Thresholds for PSD and HAP Source Status	250	250	250	250	250	250	10	25

*The flowcoat booth uses non-atomized resin application; therefore, PM emissions from these facilities are negligible.
 Neg. – Negligible

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

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

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

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year) (as defined in 326 IAC 2-7-1(22))	CAM Applicable (Y/N)	Large Unit (Y/N)
Gelcoat Booth/ VOC	N	Y	41.00	41.00	100	N	N
Gelcoat Booth/ PM	Y	Y	42.65	2.13	100	N	N
Flowcoat Booth/ VOC	N	Y	25.37	25.37	100	N	N
Flowcoat Booth/ PM	N	Y	Negligible	Negligible	100	N	N

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

The HAPs-emitting units at the source are not subject to CAM, based on the exemption for sources regulated by a NESHAP, referenced at 40 CFR 64.2(b)(1)(i).

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for 40 CFR 63, Subpart WWWW, which is incorporated by reference as 326 IAC 20-56. This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Therefore, the resin flowcoat booth identified as FC1S, the gelcoat booth identified as SB2W, and all activities associated with the production of plastic composites are subject to the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63.5780, Subpart WWWW.

Pursuant to 40 CFR 63.5785 and 40 CFR 63.5790, the affected source that is subject to the requirements of 40 CFR 63, Subpart WWWW consists of all facilities located at the source engaged in the following operations: open molding 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, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Pursuant to 40 CFR 63.5790(c), application of mold sealing and release agents, mold stripping and cleaning, repair of parts that were not manufactured by the Permittee, including non-routine manufacturing of parts, prepreg materials as defined in 40 CFR 63.5935, non-gel coat surface coatings, repair or production materials that do not contain resin or gel coat, and research and development operations as defined in section 112(c)(7) of the CAA are specifically excluded from any requirements under 40 CFR 63, Subpart WWWW.

Pursuant to 40 CFR 63.5795(b), the resin flowcoat booth identified as FC1S, the gelcoat booths identified as SB2W, and all activities associated with the production of plastic composites are an existing affected source because a reinforced plastic composites production affected source existed at this site prior to August 2, 2001.

Pursuant to 40 CFR 63.5800, the Permittee shall comply with the requirements of 40 CFR 63, Subpart WWWW on and after April 21, 2006.

Pursuant to 40 CFR 63.5810, the Permittee has chosen to comply with the requirements of 40 CFR 63, Subpart WWWW by:

- (1) Meeting the individual organic HAP emission limits for each operation, or
- (2) Using the HAP Emissions Factor Averaging Option, or
- (3) Using the Compliant Materials Option, or
- (4) Using any combination of the above.

The source will not install an add-on control device. The source wants the flexibility to use all of the averaging and compliant materials options within the MACT. The MACT allows the source to switch between compliance options.

Non-applicable portions of the NESHAP will not be included in the permit. The existing affected source associated with the production of plastic composites is subject to the following portions of 40 CFR 63, Subpart WWWW.

- (1) 40 CFR 63.5785(a)
- (2) 40 CFR 63.5790(a)-(c)
- (3) 40 CFR 63.5795(b)
- (4) 40 CFR 63.5796
- (5) 40 CFR 63.5797
- (6) 40 CFR 63.5800
- (7) 40 CFR 63.5805(b)
- (8) 40 CFR 63.5810(a)-(d)
- (9) 40 CFR 63.5835(a)
- (10) 40 CFR 63.5835(c)
- (11) 40 CFR 63.5840
- (12) 40 CFR 63.5860(a)
- (13) 40 CFR 63.5895(c) and (d)
- (14) 40 CFR 63.5900(a)(2) – (4)
- (15) 40 CFR 63.5900(b)
- (16) 40 CFR 63.5900(c)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910(a)
- (19) 40 CFR 63.5910(b)
- (20) 40 CFR 63.5910(c)(1) – (3), (5)
- (21) 40 CFR 63.5910(d)
- (22) 40 CFR 63.5910(g)
- (23) 40 CFR 63.5910(h)
- (24) 40 CFR 63.5910(i)
- (25) 40 CFR 63.5915(a)(1)
- (26) 40 CFR 63.5915(c)
- (27) 40 CFR 63.5915(d)
- (28) 40 CFR 63.5920
- (29) 40 CFR 63.5925
- (30) 40 CFR 63.5930
- (31) 40 CFR 63.5935
- (32) Table 1 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (33) Table 3 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (34) Table 4 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (35) Table 7 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (36) Table 8 to 40 CFR 63 Subpart WWWW (the applicable portions)

- (37) Table 9 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (38) Table 13 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (39) Table 14 to 40 CFR 63 Subpart WWWW (the applicable portions)

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

- (c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products, because the source does not apply surface coatings to plastic parts at this facility.
- (d) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63, Subpart VVVV - Boat Manufacturing because the source is not a boat manufacturing facility as defined by 40 CFR 63.5683(b).

State Rule Applicability - Entire Source

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

This source was constructed in 1998, is located in LaGrange County (attainment area for all pollutants), and the potential to emit of each criteria pollutant is, and was at initial construction, less than 250 tons per year (not 1 of 28 source categories). Therefore, this source is not subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-6 (Emission Reporting)

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

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

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

The operation of the facility will emit 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; however, pursuant to 326

IAC 2-4.1-1(b)(2), because this facility is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, this facility is exempt from the requirements of 326 IAC 2-4.1.

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

Particulate from the reinforced plastics composites fabricating gel coating processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-1(b)(7), the flow coating process is not subject to the particulate emission limitations set forth by 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations at the source are not subject to the requirements of 326 IAC 6-3-2 because they are operated at a consumption rate of less than six hundred twenty-five (625) pounds of rod or wire per day.

Pursuant to 326 IAC 6-3-1(b)(14), the 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 three one-hundredths grains per actual cubic foot (0.03 gr/acf) and a gas flow rate less than or equal to four thousand actual cubic feet per minute (4000 acf/min), including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations, are not subject to the requirements of 326 IAC 6-3-2 because they are manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The flowcoat and gelcoat booths (FC1S and SB2W) have the potential to emit greater than 25 tons per year of VOC from the production of boat and cargo trailer components and were constructed after July 27, 1997. Therefore, pursuant to the BACT determination in T087-14534-00051, issued January 13, 2003, and 326 IAC 8-1-6, the flowcoat and gelcoat Booths (FC1S and SB2W) shall comply with the following operating conditions:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months with compliance determined at the end of each month.
- (b) Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques 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 monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators

Association, July 2001, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes 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) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Pigmented	37
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Pigmented	34

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (4).

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

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

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category.

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

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

Units: mass = tons

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

emissions = lbs of monomer

- (4) The following categories of materials in subsection (3) shall be applied using mechanical nonatomized application technology or manual application:
- (i) Production noncorrosion resistant, unfilled resins from all sources.
 - (ii) Production, specialty product resins from all sources.
 - (iii) Tooling resins used in the manufacture of watercraft.
 - (iv) Production resin used for Class I flame and smoke products.

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

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

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

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

- (5) Unless specified in subsection (4), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (i) Nonatomized application technology.

- (ii) Air-assisted airless.
 - (iii) Airless.
 - (iv) High volume, low pressure (HVLP).
 - (v) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (6) The listed work practices shall be followed:
- (i) Cleaning operations for resin and gel coat application equipment:
 - (I) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment. To the extent possible the cleaning solvent used shall also be a non-VOC solvent.
 - (II) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (III) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
 - (ii) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (iii) Except for mixing containers as described in item (8), HAP and VOC containing materials shall be kept in a closed container when not in use.
 - (iv) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (v) Solvent collection containers shall be kept closed when not in use.
 - (vi) Clean-up rags with solvent shall be stored in closed containers.
 - (vii) Closed containers shall be used for the storage of the following:
 - (I) All production and tooling resins that contain HAPs.
 - (II) All production and tooling gel coats that contain HAPs.
 - (III) Waste resins and gel coats that contain HAPs.
 - (IV) Cleaning materials, including waste cleaning materials.
 - (V) Other materials that contain HAPs.

- (viii) 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.

The following compliance determination requirements shall be maintained to determine compliance with the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds - BACT):

-
- (a) Compliance with the VOC usage and HAP monomer content limitations shall be determined by one of the following:
- (1) The manufacturer's certified product data sheet.
 - (2) The manufacturer's material safety data sheet.
 - (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A, 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.
 - (B) 40 CFR 63, Method 311, Appendix A, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (4) An alternate method approved by IDEM, OAQ.

326 IAC 20-56 (Reinforced Plastic Composites Production)

The source performs resin or gel coat spraying and related applications. Therefore, pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following requirements in 326 IAC 20-56.

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating 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 (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 employees.
- (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 the most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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 monitoring requirements applicable to this source are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coating booth stack SV2W while the booth is 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 particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, 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.

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

Recommendation

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

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

An application for the purposes of this review was received on May 1, 2007.

Conclusion

The operation of this fiberglass manufacturing plant that produces boat and cargo trailer components shall be subject to the conditions of the attached Part 70 Operating Permit Renewal T087-24705-00051.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage
Company Name: H.R.O., Inc. dba Owens Technology
Address City IN Zip: 200 E. Vine Street, Wolcottville, IN 46795
Permit Number: T087-24705-00051
Pit ID: 087-00051
Reviewer: Stephanie Wilkerson
Date: May 25, 2007

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	
Gelcoat Booth	Styrene	11.8	25.00%	1.38	4.000	222.5	173.32	31.63	80%	
	Methyl Methacrylate	11.8	4.00%	1.38	4.000	60	46.90	8.56		
Flowcoat Booth	Styrene	9.2	29.00%	2.72	7.500	62.06	139.01	25.37	100%	
							0.00	0.00		
							0.00	0.00		
							0.00	0.00		
							0.00	0.00		
							0.00	0.00		
							0.00	0.00		
Total VOC/HAP and PM from Resin and Gel Use								65.56		

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

METHODOLOGY

Assume all of the monomer is styrene.

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

Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (July 2001) to calculate emissions.

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

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

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

Appendix A: Emission Calculations
VOC Emission Calculations - Gel Coat Booth Catalyst Usage

Company Name: H.R.O., Inc., dba Owens Technology
Address City IN Zip: 200 E. Vine St., Wolcottville, IN 46795
Permit Number: T087-24705-00051
Plt ID: 087-00051
Permit Reviewer: Stephanie Wilkerson
Date: May 25, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % VOC	VOC Emissions (ton/yr)
Catalyst (Cadox L-50A)	1	0.047000	4.00	98.00%	0.81

Total Potential Emissions **0.81**

METHODOLOGY

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