



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: December 20, 2007  
RE: WVP Acquisition Group 039-25191-00362  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
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## Minor Source Operating Permit OFFICE OF AIR QUALITY

### WVP Acquisition Corporation d/b/a/ WeVac Plastics 2401 South 17th Street Elkhart, Indiana 46517

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-25191-00362	
Issued by: Original Signed By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 20, 2007  Expiration Date: December 20, 2012

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>4</b>
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
<b>B. GENERAL CONDITIONS</b> .....	<b>5</b>
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Certification	
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13 Permit Renewal [326 IAC 2-6.1-7]	
B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15 Source Modification Requirement	
B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18 Annual Fee Payment [326 IAC 2-1.1-7]	
B.19 Credible Evidence [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>10</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	
<b>Corrective Actions and Response Steps</b>	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

**TABLE OF CONTENTS (continued)**

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**  
C.14 Malfunctions Report [326 IAC 1-6-2]  
C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]  
C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]  
[IC 13-14-1-13]

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 15**

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**  
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

**Compliance Determination Requirements**  
D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2]  
[326 IAC 8-1-4]

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**  
D.1.3 Record Keeping Requirement  
D.1.4 Reporting Requirement

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 157**

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**  
D.2.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

**Annual Notification ..... 188**  
**Malfunction Report ..... 199**  
**Quarterly Report..... 211**  
**Certification Form ..... 22**

## 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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary vacuum molded plastic parts manufacturing source.

Source Address:	2401 South 17th Street, Elkhart, Indiana 46517
Mailing Address:	2401 South 17th Street, Elkhart, IN 46517
General Source Phone Number:	574-294-2585
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) fiberglass booth, identified as MP1, installed in 1993, using flow coat applicators and hand lay-up application methods, exhausting to Stack V1 with a maximum capacity of 0.06 molds per hour, total.
- (b) One (1) plastic assembly area, identified as PA, installed in 1993, consisting of three (3) adhesive application systems, identified as PA1 through PA3, using flow coating application, with a maximum capacity of 23.75 plastic parts per hour, total.
- (c) Twelve (12) space heaters, rated at 0.25 million British thermal units per hour, each.
- (d) Ten (10) vacuum formers, identified as VF1-VF10.
- (e) One (1) drill press, identified as DP1.
- (f) One (1) chop saw, identified as CS1.
- (g) Eleven (11) band saws, identified as BS1-BS11.
- (h) Three (3) saws, identified as S1-S3.
- (i) One (1) table saw, identified as TS1.
- (j) One (1) sonic welder, identified as SW1.
- (k) One (1) torch, identified as T2.
- (l) Three (3) grinders, identified as G1-G3.
- (m) One (1) bench grinder, identified as BG1.
- (n) Two (2) shapers, identified as SH1-SH2.

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, M039-25191-00362, 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, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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**

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- (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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251
- (c) The notification 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.

**B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-25191-00362 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 permitted 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) 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.19 Credible Evidence [326 IAC 1-1-6]**

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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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.3 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.4 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.5 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.6 Fugitive Dust Emissions [326 IAC 6-4]**

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-6.1-5(a)(2)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.14 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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
- (b) 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.
- (c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Fiberglass Booth and Assembly Area

- (a) One (1) fiberglass booth, identified as MP1, installed in 1993, using flow coat applicators and hand lay-up application methods, exhausting to Stack V1, with a maximum capacity of 0.06 molds per hour, total.
- (b) One (1) plastic assembly area, identified as PA, installed in 1993, consisting of three (3) adhesive application systems, identified as PA1 through PA3, using flow coating application, with a maximum capacity of 23.75 plastic parts per hour, total.

(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 2-6.1-5(a)(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and SPM 039-15032-00362, issued January 29, 2002, the Best Available Control Technology (BACT) for the one (1) plastic assembly area, known as PA, containing three (3) adhesive application systems, was determined to be the use of quart-size plastic bottles with nozzle-type screw-on lids, to apply a bead of glue to a plastic part. The total amount of VOC delivered to the applicators shall not exceed 3.1 tons per month, with compliance determined at the end of each month.

### Compliance Determination Requirements

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

#### D.1.3 Record Keeping Requirement

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
  - (3) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.4 Reporting Requirement

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A quarterly summary of the information to document compliance with Conditions D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Miscellaneous Activities

- (c) Twelve (12) space heaters, rated at 0.25 million British thermal units per hour, each.
- (d) Ten (10) vacuum formers, identified as VF1-VF10.
- (e) One (1) drill press, identified as DP1.
- (f) One (1) chop saw, identified as CS1.
- (g) Eleven (11) band saws, identified as BS1-BS11.
- (h) Three (3) saws, identified as S1-S3.
- (i) One (1) table saw, identified as TS1.
- (j) One (1) sonic welder, identified as SW1.
- (k) One (1) torch, identified as T2.
- (l) Three (3) grinders, identified as G1-G3.
- (m) One (1) bench grinder, identified as BG1.
- (n) Two (2) shapers, identified as SH1-SH2.

(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.2.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the saws, grinders, and shapers shall be limited to less than or equal to 1.93 pounds per hour, based on a process weight rate of 0.326 tons/hr, as calculated by the following equation:

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
MC 61-53, IGCN 1003**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	WVP Acquisition Corporation d/b/a/ WeVac Plastics
<b>Address:</b>	2401 South 17th Street
<b>City:</b>	Elkhart, Indiana 46517
<b>Phone #:</b>	574-294-2585
<b>MSOP #:</b>	M039-25191-00362

I hereby certify that WVP Acquisition Corporation d/b/a/  
WeVac Plastics is :

still in operation.

no longer in operation.

I hereby certify that WVP Acquisition Corporation d/b/a/  
WeVac Plastics is :

in compliance with the requirements of  
MSOP M039-25191-00362.

not in compliance with the requirements of  
MSOP M039-25191-00362.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2



**Indiana Department of Environmental Management  
Office of Air Quality  
Compliance Data Section  
MC 61-53, IGCN 1003**

**Quarterly Report**

Source Name: WVP Acquisition Corporation d/b/a/ WeVac Plastics  
Source Address: 2401 South 17th Street, Elkhart, Indiana 46517  
Mailing Address: 2401 South 17th Street, Elkhart, IN 46517  
MSOP Permit No.: M039-25191-00362  
Facility: The one (1) plastic assembly area (PA)  
Parameter: VOC usage  
Limit: Less than 3.1 tons per month, with compliance determined at the end of each month

Year: \_\_\_\_\_

Month	VOC Usage (tons/month)

- 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**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: WVP Acquisition Corporation d/b/a/ WeVac Plastics  
Source Address: 2401 South 17th Street, Elkhart, Indiana 46517  
Mailing Address: 2401 South 17th Street, Elkhart, IN 46517  
MSOP Permit No.: M039-25191-00362

**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:

Date:

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Transition from a Federally Enforceable State Operating Permit (FESOP) to a Minor Source Operating Permit (MSOP)

#### Source Background and Description

<b>Source Name:</b>	<b>WVP Acquisition Corporation d/b/a WeVac Plastics</b>
<b>Source Location:</b>	<b>2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3083</b>
<b>Operation Permit No.:</b>	<b>M039-25191-00362</b>
<b>Permit Reviewer:</b>	<b>Hannah L. Desrosiers</b>

The Office of Air Quality (OAQ) has reviewed an MSOP application from WVP Acquisition Corporation dba WeVac Plastics relating to the operation of a stationary vacuum molded plastic parts manufacturing source.

#### History

WeVac Plastics was issued a Part 70 Operating Permit (T 039-7646-00362) on January 19, 2000. This source was subject to the requirements of the Part 70 permit program because the potential to emit of a single HAP (MEK) was greater than ten (10) tons per year, and the potential to emit of a combination of HAPs was greater than twenty-five (25) tons per year. The source accepted a federally enforceable limit such that the source was able to transition to a FESOP, on March 21, 2006, under 326 IAC 2-8. On December 19, 2005 the US EPA delisted MEK as a Hazardous Air Pollutant. Then on November 23, 2006 the Indiana Department of Environmental Management also delisted MEK as a Hazardous Air Pollutant. Therefore, the source-wide unlimited potential to emit (PTE) for HAPs is now less than ten (10) tons per year for any single HAP, and less than twenty-five (25) tons per year for any combination of HAPs. Furthermore, this source is now able to obtain an MSOP.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) fiberglass booth, identified as MP1, installed in 1993, using flow coat applicators and hand lay-up application methods, exhausting to Stack V1 with a maximum capacity of 0.06 molds per hour, total.
- (b) One (1) plastic assembly area, identified as PA, installed in 1993, consisting of three (3) adhesive application systems, identified as PA1 through PA3, using flow coating application, with a maximum capacity of 23.75 plastic parts per hour, total.
- (c) Twelve (12) space heaters, rated at 0.25 million British thermal units per hour, each.
- (d) Ten (10) vacuum formers, identified as VF1-VF10.
- (e) One (1) drill press, identified as DP1.
- (f) One (1) chop saw, identified as CS1.
- (g) Eleven (11) band saws, identified as BS1-BS11.
- (h) Three (3) saws, identified as S1-S3.
- (i) One (1) table saw, identified as TS1.

- (j) One (1) sonic welder, identified as SW1.
- (k) One (1) torch, identified as T2.
- (l) Three (3) grinders, identified as G1-G3.
- (m) One (1) bench grinder, identified as BG1.
- (n) Two (2) shapers, identified as SH1-SH2.

### **New Emissions Units and Pollution Control Equipment**

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

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

The source has constructed and/or has been operating under the previous FESOP 039-22495-00362 issued on March 21, 2006.

All terms and conditions from previous approvals issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised or deleted by this MSOP. All previous registrations and permits are superseded by this permit.

The limits in FESOP 039-22495-00362 issued on March 21, 2006, limiting HAP emissions to less than Part 70 levels have been deleted since the source-wide PTE of HAPs is less than major source levels.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Stack Summary**

<b>Stack ID</b>	<b>Stack Type</b>	<b>Height (ft)</b>	<b>Diameter (ft)</b>	<b>Flow Rate (acfm)</b>	<b>Temperature (°F)</b>
V1	Vent	15	1.67	6000	70
V2	Vent	15	1.67	6000	70

### **Recommendation**

The staff recommends to the Commissioner that the MSOP 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 administratively complete MSOP application for the purposes of this review was received on August 24, 2007.

There was no notice of completeness letter mailed to the source.

### **Emission Calculations**

See pages 1 through 5 of Appendix A of this document for detailed emission calculations.

### Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	10.0
PM-10	10.0
SO <sub>2</sub>	0.008
VOC	43.4
CO	1.10
NO <sub>x</sub>	1.31

HAPs	Potential to Emit (tons/yr)
Styrene	3.58
Methyl Methacrylate	1.27
Dimethyl Phthalate	0.160
Acrylonitrile	0.021
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	negligible
Hexane	0.024
Toluene	negligible
Lead	negligible
Cadmium	negligible
Chromium	negligible
Manganese	negligible
Nickel	negligible
<b>Total</b>	<b>5.1</b>

The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year and the potential to emit of VOC greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>2.5</sub>	Attainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-Hour Ozone	Attainment
CO	Attainment

Pollutant	Status
Lead	Attainment

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.

- (a) 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. Elkhart 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.
- (b) Elkhart County has been classified as attainment or unclassifiable 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 surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable for all the other regulated 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) Fugitive Emissions are not counted toward determination of PSD and Emission Offset applicability since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980. See the State Rule Applicability – Entire Source section.

**Source Status**

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

Pollutant	Emissions (tons/yr)
PM	10.0
PM-10	10.0
SO <sub>2</sub>	0.008
VOC	43.4
CO	1.10
NO <sub>x</sub>	1.31
Single HAP	3.6
Combination HAPs	5.1

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

These emissions are based upon FESOP Permit No. F039-22495-00362, issued on March 21, 2006

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.
- (c) The requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63.5780, Subpart WWWW) and (326 IAC 20-25), are not included in the permit for this source because this source is considered an area source as defined in 40 CFR 63.2. There are no requirements in Subpart WWWW for an area source. This rule has a compliance date of April 21, 2006.
- (d) The requirements of the National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products (40 CFR 63.4480, Subpart PPPP) and (326 IAC 20-56), are not included in the permit for this source because this source is considered an area source as defined in 40 CFR 63.2. There are no requirements in Subpart PPPP for an area source. This rule has a compliance date of April 19, 2007.

### **State Rule Applicability – Entire Source**

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

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

#### **326 IAC 2-4.1 (New Source Toxics Control / Major Sources of Hazardous Air Pollutants (HAP))**

This source was constructed prior to July 27, 1997 and was subject to the requirements of the Part 70 permit program because the potential to emit of a single HAP (MEK) was greater than ten (10) tons per year, and the potential to emit of a combination of HAPs was greater than twenty-five (25) tons per year. The source accepted a federally enforceable limit such that the source was able to transition to a FESOP, on March 21, 2006, under 326 IAC 2-8. On December 19, 2005 the US EPA delisted MEK as a Hazardous Air Pollutant. Then on November 23, 2006 the Indiana Department of Environmental Management also delisted MEK as a Hazardous Air Pollutant. Consequently, the source-wide unlimited potential to emit (PTE) for HAPs is now less than ten (10) tons per year for any single HAP, and less than twenty-five (25) tons per year for any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This existing source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

**State Rule Applicability – Fiberglass Booth and Assembly Area**

**326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)**

- (a) Pursuant to 326 IAC 6-3-1(b)(7) and 326 IAC 6-3-1(b)(14), the one (1) fiberglass booth (MP1) is exempt from the requirements of 326 IAC 6-3 since the resin and gel coat are applied with flow coat applicators or by hand lay-up.
- (b) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) plastic assembly area (PA) is exempt from the requirements of 326 IAC 6-3 since the adhesive is applied using flow coating application with a transfer efficiency of 100% (i.e., producing no particulate emissions). The adhesive is applied in quart-size plastic bottles with nozzle-type screw-on lids, and a bead of glue is applied to a plastic part.

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

- (a) The one (1) plastic assembly area (PA) is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of twenty-five (25) tons per year or more, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT).

Pursuant to 326 IAC 8-1-6 and SPM 039-15032-00362, issued January 29, 2002, the Best Available Control Technology (BACT) for the adhesive application systems (PA) was determined to be the use of quart-size plastic bottles with nozzle-type screw-on lids, to apply a bead of glue to a plastic part. The total amount of VOC delivered to the applicators shall not exceed 3.1 tons per month, with compliance determined at the end of each month.

- (b) The requirements of 326 IAC 8-1-6 are not applicable to the one (1) fiberglass booth (MP1), because the potential VOC emissions from this booth are less than twenty-five (25) tons per year.

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

The potential to emit of the source is less than ten (10) tons per year for any single HAP, and less than twenty-five (25) tons per year for the combination of all HAPs, therefore, the requirements of 326 IAC 20-25 are not applicable.

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

The potential to emit of the source is less than ten (10) tons per year for any single HAP, and less than twenty-five (25) tons per year for the combination of all HAPs, therefore, the requirements of 326 IAC 20-56 are not applicable.

**State Rule Applicability – Miscellaneous Activities**

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

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the saws, grinders, and shapers shall be limited to less than or equal to 1.93 pounds per hour,

based on a process weight rate of 0.326 tons/hr, as calculated by the following equation:

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

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

- (b) The one (1) sonic welder, (SW1) is not subject to the requirements of 326 IAC 6-3-2 because this process does not generate particulate emissions. Sonic welding uses an acoustic tool to transfer vibration energy through the plastic parts and into the weld area. The friction of the vibrating molecules generates heat, which melts and welds the plastic.

### Testing Requirements

All emission calculations were based on AP-42 emission factors, the Unified Emission Factors (UEF) for Open Molding of Composites (July 2001), and/or the MSDS submitted by the applicant, therefore, no testing is proposed.

### Compliance Requirements

Permits issued under 326 IAC 2-6 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 2-6.1-5. 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.

There are no specific compliance monitoring requirements applicable to this source. Compliance with permit conditions is demonstrated through record keeping and reporting of solvent usage.

### Conclusion

The operation of this vacuum molded plastic parts manufacturing source shall be subject to the conditions of the **MSOP 039-25191-00362**.

### IDEM Contact

Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

## Appendix A: Emissions Calculations Emission Summary

**Company Name:** WVP Acquisition Corporation dba WeVac Plastics  
**Address City IN Zip:** 2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517  
**Permit Number:** F 039-25191  
**Plt ID:** 039-00362  
**Reviewer:** Hannah L. Desrosiers  
**Application Date:** September 21, 2007

Category	Uncontrolled Potential Emissions (tons/year)					
	Emissions Generating Activity					
	Pollutant	Existing Emission Units			Revised Emission Unit	TOTAL
		Reinforced Plastics and Composites	*Surface Coating Operations	Space Heaters	Surface Coating Operations	
Criteria Pollutants	PM	0.00	0.00	0.02	0.00	<b>0.02</b>
	PM10	0.00	0.00	0.10	0.00	<b>0.10</b>
	SO2	0	0	0.01	0	<b>7.9E-03</b>
	NOx	0	0	1.31	0	<b>1.31</b>
	VOC	4.85	38.51	0.07	38.51	<b>43.4</b>
	CO	0	0.00	1.10	0	<b>1.10</b>
Hazardous Air Pollutants	Acrylonitrile	0	0.02	0	0.02	<b>0.02</b>
	Benzene	0	0	2.76E-05	0	<b>2.8E-05</b>
	Dichlorobenzene	0	0	1.58E-05	0	<b>1.6E-05</b>
	Dimethyl phthalate	0	0.16	0	0.16	<b>0.16</b>
	Formaldehyde	0	0	9.86E-04	0	<b>9.86E-04</b>
	Hexane	0	0	0.02	0	<b>0.02</b>
	Styrene	3.58	0	0	0	<b>3.58</b>
	Toluene	0	0	4.47E-05	0	<b>4.47E-05</b>
	Methyl Ethyl Ketone**	0	38.50	0	0	<b>0.00</b>
	Methyl Methacrylate	1.27	0	0	0	<b>1.27</b>
	Cadmium	0	0	1.45E-05	0	<b>1.4E-05</b>
	Chromium	0	0	1.84E-05	0	<b>1.8E-05</b>
	Lead	0	0	6.57E-06	0	<b>6.6E-06</b>
	Manganese	0	0	4.99E-06	0	<b>5.0E-06</b>
	Nickel	0	0	2.76E-05	0	<b>2.8E-05</b>
	<b>Totals</b>	<b>4.851</b>	<b>***</b>	<b>0.025</b>	<b>0.180</b>	<b>5.1</b>
<b>Worse Case HAP</b>						<b>3.6</b>

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

\* Data shown for comparison but not included in calculations

2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites**

**Company Name:** WVP Acquisition Corporation dba WeVac Plastics  
**Address City IN Zip:** 2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517  
**Permit Number:** F 039-25191  
**Pit ID:** 039-00362  
**Reviewer:** Hannah L. Desrosiers  
**Application Date:** September 21, 2007

Material	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	HAPs Emissions		
												*Transfer Efficiency	Tons of Styrene per year	Tons of MMA per year
<b>MP1</b>														
Filler (6370)	9.95	20.00%	0.00%	50	0	2.18	0.06	0.03	0.79	0.14	0.00	100%	0.14	0.00
Gelcoat (945YA058)	9.07	41.78%	4.74%	278	75	1.26	0.06	0.12	2.90	0.53	0.00	100%	0.42	0.11
Resin (040-8047)	8.92	38.78%	3.00%	117	45	22.00	0.06	0.95	22.89	4.18	0.00	100%	3.02	1.16
Weight % Organics														
<b>Solvents/Cleaners/Release Agents</b>														
ACETONE	NA	NA	NA	NA	NA	NA	NA	0.00	0.00	0.00	0.00	100%	0.00	0.00
<b>Total</b>								<b>1.11</b>	<b>26.58</b>	<b>4.85</b>	<b>0.00</b>		<b>3.58</b>	<b>1.27</b>

\* Fiberglass is applied using flow coating application with transfer efficiency of 100%

<b>Total PM (tpy):</b>	<b>0.00</b>
<b>Total VOC (tpy):</b>	<b>4.85</b>
<b>Total HAPS (tpy):</b>	<b>4.85</b>

**METHODOLOGY**

Potential VOC From Resins/Gel, Pounds per Hour = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] \* (1 ton/2000 lbs)  
 Potential VOC From Resins/Gel, Pounds per Day = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] \* (1 ton/2000 lbs)  
 Potential VOC From Resins/Gel, Tons per Year = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] \* (1 ton/2000 lbs)  
 Potential VOC From Solvents, Pounds per Hour = Density (lb/gal) \* (Weight % Organics) \* Gal of Material (gal/unit) \* Maximum (unit/hr)  
 Potential VOC From Solvents, Pounds per Day = Density (lb/gal) \* (Weight % Organics) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day)  
 Potential VOC From Solvents, Tons per Year = Density (lb/gal) \* (Weight % Organics) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 PM, tons per year = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (1 - Weight % Styrene - Weight % MMA) \* (1 - Transfer Efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 Styrene emissions, tons per year = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Styrene Emission Factor (lb/ton) \* (1 ton Styrene / 2000 lbs Styrene) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 MMA emissions, tons per year = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* MMA Emission Factor (lb/ton) \* (1 ton MMA / 2000 lbs MMA) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 Emission Factors ( lbs Styrene or MMA / ton resin or gelcoat ) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), July 2001

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** WVP Acquisition Corporation dba WeVac Plastics  
**Address City IN Zip:** 2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517  
**Permit Number:** F 039-25191  
**Plt ID:** 039-00362  
**Reviewer:** Hannah L. Desrosiers  
**Application Date:** September 21, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>PA</b>																
ABS Glue (30915)	7.09	75.000%	0.0%	75.0%	0.0%	20.80%	0.06959	23.75	5.32	5.32	8.79	210.93	38.49	0.00	25.56	100%
PVA Green 67	6.76	30.000%	0.0%	30.0%	0.0%	15.00%	0.00010	23.75	2.03	2.03	0.00	0.12	0.02	0.00	13.51	100%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>				<b>Uncontrolled</b>	<b>8.79</b>	<b>211.04</b>	<b>38.51</b>	<b>0.00</b>
					<b>PM Control Efficiency:</b>				<b>0.00%</b>
					<b>Controlled</b>	<b>8.79</b>	<b>211.04</b>	<b>38.51</b>	<b>0.00</b>

\* Adhesive is applied using flow coating application with transfer efficiency of 100%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
Revised HAP Emission Calculations**

**Company Name: WVP Acquisition Corporation dba WeVac Plastics**  
**Address City IN Zip: 2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517**  
**Permit Number: F 039-25191**  
**Plt ID: 039-00362**  
**Reviewer: Hannah L. Desrosiers**  
**Application Date: September 21, 2007**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Dimethyl phthalate	Weight % Acrylonitrile	Dimethyl phthalate Emissions (ton/yr)	Acrylonitrile Emissions (ton/yr)	<b>Total HAP Emissions (ton/yr)</b>
<b>PA</b>								
ABS Glue (30915)	7.09	0.06959	23.75	0.00%	0.04%	0.00	0.021	<b>0.02</b>
PVA Green 67	6.76	0.00010	23.75	0.00%	0.00%	0.00	0.00	<b>0.00</b>
<b>MP1</b>								
Lupersol	9.04	0.21000	0.060	32.00%	0.00%	0.160	0.00	<b>0.160</b>
<b>Total State Potential Emissions</b>						<b>0.160</b>	<b>0.021</b>	<b>0.18</b>

**METHODOLOGY**

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

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

Company Name: WVP Acquisition Corporation dba WeVac Plastics  
Address City IN Zip: 2401 South 17<sup>th</sup> Street, Elkhart, Indiana 46517  
Permit Number: F 039-25191  
Plt ID: 039-00362  
Reviewer: Hannah L. Desrosiers  
Application Date: September 21, 2007

*\*Emissions for 12 Space Heaters - each rated at 0.25 million British thermal units per hour*

**PTE and VOC Emissions**

Heat Input Capacity  
MMBtu/hr  
3.00

Potential Throughput  
MMCF/yr  
26

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.025	0.100	0.008	1.31	0.072	1.10

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

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

**HAPs Emissions**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	2.76E-05	1.58E-05	9.86E-04	0.02	4.47E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021
Potential Emission in tons/yr	6.57E-06	1.45E-05	1.84E-05	4.99E-06	2.76E-05

**Total HAPs 0.02 tpy**

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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