



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 22, 2008

RE: Tocon Holdings / 039-25468-00671

FROM: Matthew Stuckey, 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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## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Tocon Holdings, LLC  
1302 East Monroe Street  
Goshen, Indiana 46528**

(herein known as the Permittee) is hereby authorized to construct and 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. 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 2-8 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.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F039-25468-00671	
Original signed by:	Issuance Date: April 22, 2008
Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Expiration Date: April 22, 2013

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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 2-8-3(b)]

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The Permittee owns and operates a stationary fiberglass part manufacturing plant.

Source Address:	1302 East Monroe Street, Goshen, Indiana 46528
Mailing Address:	1302 East Monroe Street, Goshen, IN 46528
General Source Phone Number:	(574) 534-8222
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) custom fiberglass resin and gel coat open molding booth, identified as EU01, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a non-atomized flow coater and a dry filter for particulate control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) custom hand-lay fiberglass resin and gel coat open molding booth, identified as EU02, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a manual hand roller, and exhausting to the indoors.
- (c) Two (2) natural gas-fired boilers, identified as B01 and B02, constructed in 1969 and 1977 respectively, with a heat input capacity of 11.7 million British thermal units per hour each, and exhausting to stacks S7 and S8.
- (d) One (1) custom grinding, sanding, and surface grinding booth, identified as EU03, approved for construction in 2008, with a maximum capacity of 9.53 pounds per day, using a dry filter for particulate control and exhausting to stack S4.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

---

This stationary source also includes the following insignificant activities:

- (a) Activities performed using hand-held equipment, including the following:
  - (1) sanding, which vents to the indoors.
- (b) Cleaners and solvents, where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months;

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and [326 IAC 2-8] when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F039-25468-00671, 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.5 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.6 Enforceability [326 IAC 2-8-6]

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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.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(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.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.15** Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-25468-00671 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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

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

**B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.19 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. 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 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 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 2-8 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.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).

- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.22 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP 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.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### 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]

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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]

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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 Stack Height [326 IAC 1-7]

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

C.8 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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.10 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 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.14 Risk Management Plan [326 IAC 2-8-4] [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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 2-8-4(3)]**

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

#### **C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on

calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) custom fiberglass resin and gel coat open molding booth, identified as EU01, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a non-atomized flow coater and a dry filter for particulate control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) custom hand-lay fiberglass resin and gel coat open molding booth, identified as EU02, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a manual hand roller, and exhausting to the indoors.

(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 2-8-4(1)]

#### D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-4.1] [40 CFR 63, Subpart WWWW]

The total usage of resins, gel coats, catalysts, and solvents used in booths EU01 and EU02 shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.22 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP), and 40 CFR 63, Subpart WWWW not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total usage of resins, gel coats, catalysts, and solvents used in booth EU01, shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from booth EU01 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

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

- (a) Compliance with the VOC/HAP content and usage limitations contained in Conditions D.1.1 and D.1.2 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/HAP 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.

- (b) VOC/HAP emissions from gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, July 23, 2001 or its updates. VOC/HAP emissions from all other operations shall be calculated using the following equation:

$$E = \sum_{i=1}^{i=n} \left( (A_i \times B_i) / 2000 \right) \times (UEF_i / 2000)$$

Where:

E = VOC/HAP emissions (tons/month)

n = no. of coatings used during the day

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

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

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

i = type of resin or gel

2000 = conversion factor (lbs/ton)

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **D.1.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the custom fiberglass booth stacks (Stacks 1, 2, and 3) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks 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 2-8-4(3)]**

#### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records in accordance with (1) and (2).
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gelcoat and resin shall be recorded. VOC/HAP emissions shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gelcoat

and resin, and summing the emissions for all gelcoats 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 23, 2001 or its updates. 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, monomer in resins and gelcoats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limitations established in Conditions D.1.1 and D.1.2.
  - (1) The amount of each resin, gel coat, catalyst, and solvent used. The VOC and HAP content of each resin, gel coat, catalyst, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The total VOC and HAP usage for each month;
  - (3) The cleanup solvent usage for each month; and
  - (4) The weight of VOC and HAP emitted for each compliance period.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. 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:

- (c) Two (2) natural gas-fired boilers, identified as B01 and B02, constructed in 1969 and 1977 respectively, with a heat input capacity of 11.7 million British thermal units per hour each, and exhausting to stacks S7 and S8.
- (d) One (1) custom grinding, sanding, and surface grinding booth, identified as EU03, approved for construction in 2008, with a maximum capacity of 9.53 pounds per day, using a dry filter for particulate control and exhausting to stack S4.

### Insignificant Activities:

- (a) Activities performed using hand-held equipment, including the following:
  - (1) sanding, which vents to the indoors.

(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 2-8-4(1)]

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

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Pursuant to 326 IAC 6-2-3(d) and (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from B01 and B02 shall in no case exceed 0.8 and 0.6 pounds of particulate matter per million British thermal units heat input respectively.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Tocon Holdings, LLC  
Source Address: 1302 East Monroe Street, Goshen, Indiana 46528  
Mailing Address: 1302 East Monroe Street, Goshen, IN 46528  
FESOP Permit No.: F039-25468-00671

**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  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Tocon Holdings, LLC  
Source Address: 1302 East Monroe Street, Goshen, Indiana 46528  
Mailing Address: 1302 East Monroe Street, Goshen, IN 46528  
FESOP Permit No.: F039-25468-00671

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|---|

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

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

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

Page 2 of 2

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

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

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

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

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

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Tocon Holdings, LLC  
 Source Address: 1302 East Monroe Street, Goshen, Indiana 46528  
 Mailing Address: 1302 East Monroe Street, Goshen, IN 46528  
 FESOP Permit No.: F039-25468-00671  
 Facility: EU01 and EU02  
 Parameter: Single HAP Usage/Emissions  
 Limit: The total usage of resins, gel coats, catalysts, and solvents used in booths EU01 and EU02 shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.22 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.  
 Note: Emission Factors provided by "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP Emissions This Month	Single HAP Emissions Previous 11 Months	Single HAP Emissions 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

### FESOP Quarterly Report

Source Name: Tocon Holdings, LLC  
 Source Address: 1302 East Monroe Street, Goshen, Indiana 46528  
 Mailing Address: 1302 East Monroe Street, Goshen, IN 46528  
 FESOP Permit No.: F039-25468-00671  
 Facility: EU01  
 Parameter: VOC Usage/Emissions  
 Limit: The total usage of resins, gel coats, catalysts, and solvents used in booth EU01, shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: Emission Factors provided by "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tocon Holdings, LLC  
Source Address: 1302 East Monroe Street, Goshen, Indiana 46528  
Mailing Address: 1302 East Monroe Street, Goshen, IN 46528  
FESOP Permit No.: F039-25468-00671

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

Page 1 of 2

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

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

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

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

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

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

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Tocon Holdings, LLC  
1302 East Monroe Street  
Goshen, Indiana 46528

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Tocon Holdings, LLC 1302 East Monroe Street, Goshen, Indiana 46528, completed construction of the fiberglass part manufacturing plant on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 29, 2007 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F039-25468-00671, Plant ID No. 039-00671 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_

Name \_\_\_\_\_ (typed or printed)

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

**Addendum to the Technical Support Document (ATSD) for a  
New Source Construction and Federally Enforceable State Operating  
Permit (FESOP)**

**Source Background and Description**

<b>Source Name:</b>	<b>Tocon Holdings, LLC</b>
<b>Source Location:</b>	<b>1302 East Monroe Street, Goshen, Indiana 46528</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3799</b>
<b>Operation Permit No.:</b>	<b>F 039-25468-00671</b>
<b>Permit Reviewer:</b>	<b>Brian Williams</b>

On January 29, 2008, the Office of Air Quality (OAQ) had a notice published in the Goshen News newspaper in Elkhart County, Indiana, stating that Tocon Holdings, LLC had applied for a New Source Construction and Federally Enforceable State Operating Permit (FESOP) to construct and operate a new fiberglass part manufacturing plant, located at 1302 East Monroe Street, Goshen, Indiana 46528. The notice also stated that the OAQ proposed to issue a New Source Construction and FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. The notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. A public meeting was held on March 24, 2008 at the Goshen Public Library in Goshen, Indiana and the public comment period was extended to March 25, 2008. This addendum contains written comments received during the public comment period, including the public meeting held on March 24, 2008.

**Comments and Responses**

Comments on the draft permit were submitted by Albert and Mary Ellen Meyer, Peter Oakley, Valerie Collins, Edgar Benner, Rebecca Oyer Meyers, Stuart Meade, Julia King, Everett Thomas, Carol Mathia, Morgan Kraybill, Tamara Shantz, Phyllis Stutzman, Wilma Harder, Nicole Bauman, Leonard Gross, Jan Graber Johnson, Eric Kurtz, Paula White, Elizabeth Buschert, Les and Gwen Gustafson-Zook, John Buschert, Karl Stutzman, Jason Kauffman, Carmen Horst, Mary Yoder, Allen Peachey, Carolyn Schrock-Shenk, Daniela Zehr, Keith Graber Miller, Richard and Shari Gingerich, George Smucker, Launa Rohrer, Lori Stump, Allan Kauffman, Julie Gautsche, Hank Moore, Susie Neff, and Jean Hirschler.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Many comments expressed concerns regarding the lack of smokestack height requirements in the draft permit. Without smokestack height requirements the particulate matter, volatile organic compounds, carbon monoxide, and other hazardous air pollutants will be vented right from the top of the building. Under these conditions, it is easy to imagine there will be high concentrations of these unhealthy air pollutants in the immediate neighborhood areas, such as the Goshen High School.

### Response to Comment 1:

Upon further review, it appears the stack height provisions contained in 326 IAC 1-7-1 were inadvertently omitted from the draft permit. Tocon Holdings, LLC has exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter are emitted.

Good Engineering Practice (GEP) stack height is defined at its most basic level by a formula that defines the height in terms of nearby building dimensions. The wind blowing across buildings can cause a downwash effect that pulls the emissions from the stack to the ground at a faster rate. GEP stack height is intended to minimize this effect and the increase in ground level pollutant concentrations that can occur. The Clean Air Act acknowledges that this is a legitimate approach, but places limitations on the use of dispersion techniques as a means to comply with air quality standards. The stack height requirements of 326 IAC 1-7 address both of these issues.

326 IAC 1-7-3 requires that stacks conform to GEP to limit excessive concentrations of air pollutants. This section allows for shorter stacks if a more sophisticated analysis demonstrates that excessive concentrations of air pollutants will not result. There are also several exemptions provided from this section including an exemption for stacks that actually emit less than 25 tons per year.

326 IAC 1-7-4 requires the stack height that can be used in air quality models. Erecting a very tall stack can be considered a dispersion technique that is not allowed under the Clean Air Act. Actual stack heights up to 65 meters can always be used. Heights in excess of 65 meters can be used only to the extent that results from the GEP formula. Therefore, while a stack may actually be greater in height, the GEP formula limits the height used in the model. The vents/stacks proposed by Tocon Holdings, LLC range from 6.71 meters to 9.15 meters high. The air quality analysis (Appendix B of the Addendum) confirms that excessive concentrations will not occur based on these heights. However, the addition of the stack height condition below will help to ensure that any future changes in stack height will be subject to review.

Due to this comment, the following condition will be added to Section C:

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

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

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C.78 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...  
C.89 Performance Testing [326 IAC 3-6]

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...  
C.910 Compliance Requirements [326 IAC 2-1.1-11]

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...  
C.4011 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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...  
C.4412 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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...  
C.4213 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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...  
C.4314 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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...  
C.4415 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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...

~~C.4516~~ Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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...

~~C.4617~~ General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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...

~~C.4718~~ General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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...

~~C.4819~~ Compliance with 40 CFR 82 and 326 IAC 22-1

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...

#### **Comment 2:**

Many comments were submitted requesting that IDEM deny Tocon Holdings, LLC request to build a fiberglass manufacturing plant because the plant will be located very close to sensitive populations, such as schools, retirement communities, residential neighborhoods, and nursing homes. Concerns were also expressed about the current level of increased cancer risk in Elkhart County; how will granting this permit continue to work to decrease cancer or respiratory risk factors? The Citizens of Indiana trust there is aggregate or comparative data that would create a more informed perspective.

#### **Response to Comment 2:**

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

Since many comments expressed concern about the health impacts from air pollution emissions from Tocon Holdings, LLC, IDEM, OAQ, conducted an air modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants from this proposed source to estimate whether the Limited PTE criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS). The criteria pollutants included in the modeling analysis were carbon monoxide (CO), lead (Pb), sulfur dioxide (SO<sub>2</sub>), particulate matter to a diameter of 2.5 microns (PM<sub>2.5</sub>), and nitrogen oxides (NO<sub>x</sub>).

The Screen 3 modeling results indicated that the Limited PTE criteria pollutants (Pb, SO<sub>2</sub>, NO<sub>x</sub>, and CO) from this source will not exceed the National Ambient Air Quality Standards (NAAQS) (see Appendix A of the ATSD for more details). However, the Screen 3 modeling results indicated the need to perform more refined modeling for PM<sub>10</sub>.

As a result, more refined PM<sub>10</sub> modeling was performed. In addition, refined HAP modeling for styrene was performed, since many residents expressed concern about the health impacts from styrene emissions.

The results of PM<sub>10</sub> modeling predicted that there is no location beyond the facility boundaries with modeled concentrations greater than the NAAQS limits. The results of styrene modeling also predicted that there is no location beyond the facility boundary with modeled concentrations greater than evaluation indexes for non-cancer acute and chronic hazard screening analysis suggested by IDEM. Therefore, there should be no adverse health impacts from the new construction project. IDEM's, Air Quality Analysis for Tocon Holdings, LLC - Appendix B is attached to this Addendum.

There are no changes to the permit due to these comments.

**Comment 3:**

Many comments expressed concern that Elkhart County already has significant air quality problems. In addition, many comments expressed concern that Elkhart County will not be able to meet the new federal standard for ozone, which was strengthened on March 12, 2008 by the U.S. EPA. Many commentators expressed concern that it is highly likely that Elkhart County will be designated nonattainment for ozone in 2010. As a result, they questioned the logic of approving any new sources of air pollution, including but not limited to Tocon Holdings, LLC in Elkhart County. In addition, the potential negative health risks associated with the air emissions from this source outweigh any benefits Tocon Holdings, LLC will bring to the City of Goshen.

**Response to Comment 3:**

As indicated in the TSD, Elkhart County is in attainment for all the National Ambient Air Quality Standards. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

The Federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead (Pb), sulfur dioxide (SO<sub>2</sub>), particulate matter to a diameter of 2.5 microns (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>) and ground level ozone. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set low enough to protect the health of even the most sensitive persons, such as children, the elderly and people with preexisting health conditions, such as asthma, bronchitis and cardiovascular disease. Each NAAQS also has a secondary standard. Secondary standards set limits to protect public welfare, including protection against visibility impairment, damage to animals, crops, vegetation, and buildings. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated (See Response to Comment 2).

The federal Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and the U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS. The federal standard for ozone was strengthened on March 12, 2008. In 2010, the U.S. EPA will designate the areas that do not meet the new ozone standard. The U.S. EPA works with Indiana, Illinois and Kentucky in monitoring air pollution levels and in determining when air pollution modeling is needed.

Ozone (O<sub>3</sub>) is a gas composed of three oxygen atoms. It is not usually emitted directly into the air, but at ground-level is created by a chemical reaction between oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC) in the presence of sunlight. Ozone has the same chemical structure whether it occurs miles above the earth or at ground-level and can be "good" or "bad," depending on its location in the atmosphere.

In the earth's lower atmosphere, ground-level ozone is considered "bad." Cars and other vehicles are the largest source of ozone precursors. Other important sources include industrial facilities, power plants, gasoline-powered mowers, and evaporation of cleaners, paints, and other

chemicals. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form in harmful concentrations in the air. As a result, it is known as a summertime air pollutant. Many urban areas tend to have high levels of "bad" ozone, but even rural areas are also subject to increased ozone levels because wind carries ozone and pollutants that form it hundreds of miles away from their original sources.

"Good" ozone occurs naturally in the stratosphere approximately 10 to 30 miles above the earth's surface and forms a layer that protects life on earth from the sun's harmful rays.

There are many voluntary actions available to citizens to help reduce air pollutant such as ozone. More information can be found on IDEM's Be Air Aware site at [http://www.in.gov/idem/your\\_environment/airaware/](http://www.in.gov/idem/your_environment/airaware/).

Finally, IDEM conducts sampling of the ambient air at monitoring stations around Indiana. This air monitoring measures whether the NAAQS are being met. Information about Indiana's air monitoring system and monitoring results are available at <http://www.in.gov/idem/programs/air/amb/index.html>. Information about current and expected air pollution levels are on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

There are no changes to the permit due to these comments.

**Comment 4:**

There are monitoring wells for ground water contamination on the site in the parking lot. This has been ongoing for a number of years. Will the manufacturing of fiberglass affect these wells?

**Response to Comment 4:**

The draft air pollution control permit does not allow the discharge of water or any liquid. If the source is going to have such a discharge, it will need to apply for and obtain a National Pollution Discharge Elimination System (NPDES) permit from IDEM's Office of Water Quality. In addition, the source may need to have a Storm Water Permit. The Office of Air Quality's permit review by law cannot address issues for which it does not have direct regulatory authority. For additional information regarding NPDES and Storm Water Permits contact IDEM, OWQ employee Beth Tallon, e-mail: [btallon@idem.IN.gov](mailto:btallon@idem.IN.gov), telephone: (317) 232-8706 or toll free at (800) 451-6027, ext. 2-8706.

Additionally, IDEM's Office of Water Quality, Ground Water Section, protects and assesses Indiana's source water. The Ground Water Section provides guidance for public water systems in establishing Wellhead Protection Plans, Source Water Assessment Plans, as well as providing guidance to private well owners. More information is available at IDEM's website at <http://www.in.gov/idem/programs/water/swp/index.html> on the internet or by contacting IDEM at (800) 451-6027 and asking for the Ground Water Section.

There are no changes to the permit due to this comment.

**Comment 5:**

According to the "Permit Level Determination - FESOP" section on page 3 of the TSD the source will have a potential to emit 4.11 tons of methyl methacrylate per year. However, why are there no methyl methacrylate emission calculations in Appendix A of this TSD?

**Response to Comment 5:**

Page 2 of 4 in Appendix A of this TSD provided detailed emission calculations for methyl methacrylate, which was abbreviated as MME. The table on page 3 of the TSD is designed to summarize the unlimited potential to emit for the entire source, which is calculated in more detail in Appendix A.

There are no changes to the permit due to this comment.

**Comment 6:**

Are epoxy resins used at this source?

**Response to Comment 6:**

No, this source will not use epoxy resins. Based on the information submitted to IDEM, the source will use polyester resins, which differ from epoxy resins.

There are no changes to the permit due to this comment.

**Comment 7:**

Did Tocon Holdings, LLC consider a closed-mold system or bio-based materials to replace petroleum-based resins as ways to reduce emissions and improve the environment of Goshen?

**Response to Comment 7:**

There are no applicable air requirements or regulations that require this source to use a closed-mold system or bio-based materials; therefore, by law IDEM, OAQ cannot require the source to use this system or materials.

There are no changes to the permit due to this comment.

**Comment 8:**

Does Purdue University still have the Indiana Clean Manufacturing Technology and Safe Materials Institute? Would this be available to a small manufacturer like Tocon Holdings, LLC? The source seems to have an interest in clean technology and reducing air emissions.

**Response to Comment 8:**

The Indiana Clean Manufacturing Technology and Safe Materials Institute is now known as the Clean Manufacturing Technology Institute (CMTI) and is currently located at Purdue University's Discovery Park. According to the CMTI website, "the institute is currently staffed by three process engineers, an administrator and two administrative support personnel. CMTI provides technical assistance, outreach, education, planning services and research to facilitate the adoption of pollution prevention/clean manufacturing strategies by Indiana manufacturing facilities."

"CMTI co-founded (in 1996), and continues to manage, the Coating Applications Research Laboratory (CARL) on the Purdue campus. The lab allows manufacturers to test state-of-the-art coating and curing technologies under the guidance of CMTI engineers, expert in their application. Air emissions testing provides coating applicators and formulators with EPA Method 25A emission analysis to test emissions from new coatings. CARL is the contracted styrene emissions test laboratory for the American Composite Manufacturers Association and in partnership with ACMA, CMTI has developed and improved resin/gelcoat application and infusion technologies for the benefit of composite manufacturers."

There are no applicable air requirements or regulations that require this source to contact the CMTI; therefore, by law IDEM, OAQ cannot require the source to contact them. However, if the source would like to contact them more information on the CMTI can be found at <https://engineering.purdue.edu/CMTI/>

In addition, the source can contact IDEM's, Office of Compliance and Technical Assistance. The Compliance and Technical Assistance Program (CTAP) is Indiana's small business assistance program (SBAP). CTAP provides free, confidential, environmental assistance to Indiana businesses. More information can be found at <http://www.in.gov/idem/programs/oppta/index.html>

There are no changes to the permit due to this comment.

**Comment 9:**

According to the "State Rule Applicability Determination" section on Page 6 of the Technical Support Document, it appears this source does not have to report emissions. How does IDEM know whether they are exceeding the permit standards?

**Response to Comment 9:**

Condition D.1.5 of the permit contains compliance determination requirements the source must use to determine compliance with the VOC and HAPs emission limitations contained in Conditions D.1.1 and D.1.2. In addition, Conditions D.1.7 and D.1.8 address specific recordkeeping and reporting requirements applicable to the source. The source is required to submit an annual compliance certification form, which is on page 27 of the permit. The source is also required to submit their single HAP emissions and VOC emissions on a quarterly basis, using the reporting forms on page 30 and 31 of the permit.

There are no changes to the permit due to this comment.

**Comment 10:**

If residents surrounding the source see "fugitive dust emissions" that escape beyond the property line of the source, who should they contact?

**Response to Comment 10:**

Residents should contact the Compliance Inspector assigned to Elkhart County. At this time, David North is currently assigned to Tocon Holdings, LLC. David can be reached at (574) 245-4891 or by contacting IDEM's Northern Regional Office at (800) 753-5519. In addition, IDEM's Complaint Clearinghouse provides more information regarding filing complaints and is available at <http://www.in.gov/idem/contact/complaints/index.html>

There are no changes to the permit due to this comment.

**Comment 11:**

According to the "Background and Description of New Source Construction" section on Page 2 of the Technical Support Document (TSD), Johnson Controls was issued an exemption on September 19, 2007, for six air strippers associated with associated with a groundwater remediation system at the source. However, under the "Enforcement Issues" on Page 3 of the TSD there are no pending enforcement actions related to this source? Is there remediation currently occurring at this location?

### **Response to Comment 11:**

The Office of Air Quality's permit review by law cannot address issues for which it does not have direct regulatory authority. The "Enforcement Issues" section of the TSD only refers to air related enforcement issues. While Johnson Controls no longer owns the facility, they still own the six air strippers. Therefore, the Johnson Controls exemption is considered separate from Tocon Holdings, LLC New Source Construction and FESOP. As a result, this draft permit and several supporting documents only address potential air emissions generated by the processes associated with the new fiberglass part manufacturing plant, owned by Tocon Holdings, LLC.

According to IDEM's, Office of Land Quality, Johnson Controls is currently participating in IDEM's "Voluntary Remediation Program." More information about this program can be found at the following IDEM website: <http://www.in.gov/idem/programs/land/vrp/index.html>

There are no changes to the permit due to this comment.

### **Comment 12:**

Concerns have been expressed about how this particular permit process was viewed by Tocon Holdings, LLC, and the staff of IDEM. On March 17, 2008, the Goshen News published an article, which contained the following statements, "I think people just want to be informed," James D. Conroy II, owner of Conroy Steel, said.

"The booth, already completed and waiting to go into operation, will allow for the manufacturing of custom assemblies and other fiberglass components for cargo trucks, trailers, buses and recreational vehicles."

If the residents of Goshen, "just want to be informed" about a "done-deal," why have a meeting that is labeled "Preliminary Findings?"

### **Response to Comment 12:**

Tocon Holdings, LLC are not representatives of IDEM, therefore; Tocon's views and comments of the permitting process and public notice requirements do not reflect IDEM's perspective on this matter.

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. Before the draft permit is available to the public for review, a great deal of effort is made by IDEM, OAQ to ensure that the permit contains all applicable Federal and State air pollution regulations and the source is issued the correct permit level based on its potential to emit.

If an applicant demonstrates that they will be able to comply with all applicable Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. Unless someone can demonstrate that OAQ has made a substantive technical error in the permit, such as incorrectly identifying an applicable State or Federal rule, or calculating emissions incorrectly, the permit in question is generally issued with few if any changes after the public notice has ended.

However, if an applicant cannot demonstrate that they will be able to comply with all applicable Federal and State laws regarding air pollution, IDEM is not required by law to issue the air permit. IDEM, OAQ, does not feel that it is appropriate to devote its resources to drafting an air permit and providing it to the public for comment, if IDEM intends to deny the permit once the public notice period has ended. Instead, IDEM, OAQ would request that the applicant withdraw the application and resubmit a new application when they can demonstrate that they will be able to comply with

all applicable Federal and State air pollution regulations.

There are no changes to the permit due to this comment.

**Comment 13:**

Many residents expressed concern regarding odors that result during the manufacturing of fiberglass. In addition, many residents expressed concern that the source is located in a residential neighborhood.

**Response to Comment 13:**

IDEM, OAQ recognizes that these matters are of great personal concern to the commenter's and other local residents. However, IDEM, OAQ does not have authority to regulate zoning, noise, odor, or traffic on roads or railroads. These matters are under the separate authority of local government units, such as a zoning board, county council or county commission. IDEM, OAQ is required to issue air pollution control permits to sources that have indicated that they can comply with all applicable air pollution control requirements, whether or not the local government unit has made zoning or construction approvals.

However, odors might be an indicator that the source is out of compliance, please contact the current Compliance Inspector, David North, at (574) 245-4891 or IDEM's Northern Regional Office at (800) 753-5519 to file an odor complaint. In addition, IDEM's Complaint Clearinghouse provides more information regarding filing complaints is available at IDEM's website at <http://www.in.gov/idem/contact/complaints/index.html>.

There are no changes to the permit due to this comment.

**Comment 14:**

Is the source currently operating without a permit?

**Response to Comment 14:**

On February 5, 2008, IDEM, OAQ, inspected Tocon Holdings, LLC due to a complaint alleging that the source had constructed and was operating without a permit. At the time of the inspection, emission units EU01, EU02, and EU03 had not yet been constructed. However, the source had made three molds using hand lay-up only, which based on emissions did not require the construction of any of the equipment. Based on this inspection, no violations were discovered.

There are no changes to the permit due to this comment.

**Comment 15:**

How are emissions limited from this source? Are they limited at the point of entry into the air, by specifying what chemicals can be used, or what manufacturing process is used? It is expected that the plant will release up to 295 tons of pollutants into the nearby air over the course of a year. Please do not endanger the health of local high school students and residents by allowing unrestrained or unprocessed emissions.

**Response to Comment 15:**

The appropriate level of permitting required by any emission source is based primarily on its potential to emit. The potential to emit ([See 326 IAC 2-1.1-1\(16\)](#)) is the total potential emissions of

any regulated pollutant which could result from operating under a "worst case operating scenario," running twenty four hours a day (with no pollution control equipment), 365 days a year at full capacity. Tocon Holdings, LLC will have a potential to emit (PTE), 10.25 tons of nitrogen oxides (NO<sub>x</sub>), 8.61 tons of carbon monoxide (CO), 45.38 tons of volatile organic compounds (VOC), 115.85 tons of particulate matter (PM), 116.43 tons of particulate matter with an aerodynamic diameter of less than ten microns (PM<sub>10</sub>), 0.06 tons sulfur dioxide (SO<sub>2</sub>), 40.37 tons of styrene, and 44.67 tons of total hazardous air pollutants (HAPs) (including styrene and methyl methacrylate).

As a result, since the PTE of PM<sub>10</sub> is greater than or equal to one hundred (100) tons per year, the source would have been subject to the provisions of 326 IAC 2-7 (Title V). The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions of PM<sub>10</sub> to less than the Title V major source threshold levels.

The PTE of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7 (Title V). However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

In addition, to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to booth EU01 the source shall limit the potential to emit of VOC from booth EU01 to less than twenty-five (25) tons per year.

After issuance of the FESOP, the source will have a limited potential to emit of 10.25 tons of NO<sub>x</sub>, 8.61 tons of CO, 24.71 tons of VOC, 19.11 tons of PM, 19.69 tons of PM<sub>10</sub>, 0.06 tons sulfur SO<sub>2</sub>, 9.22 tons of styrene, and 13.52 tons of total hazardous air pollutants (HAPs) (including styrene and methyl methacrylate).

The source has accepted the following emission limits:

The total usage of resins, gel coats, catalysts, and solvents used in booths EU01 and EU02, shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.22 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The total usage of resins, gel coats, catalysts, and solvents used in booth EU01, shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The source is also required to use dry filters at all times to control PM and PM<sub>10</sub> emissions from booth EU01.

Finally, particulate emissions from the two boilers (B01 and B02) shall in no case exceed 0.8 and 0.6 pounds of particulate matter per million British thermal units heat input respectively.

The VOC and HAP emissions from gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 or its updates. The appropriate emission factors are determined by the styrene and/or methyl methacrylate content of the resins and gelcoats and the application method.

VOC/HAP emissions from all other operations shall be calculated using the following equation:

$$E = \sum_{i=1}^{i=n} \left( (A_i \times B_i) / 2000 \right) \times (UEF_i / 2000)$$

Where:

E = VOC/HAP emissions (tons/month)

n = no. of coatings used during the day

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

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

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

i = type of resin or gel

2000 = conversion factor (lbs/ton)

In addition, see Response to Comment 3 for more health related information.

There are no changes to the permit due to these comments.

**Comment 16:**

If Tocon Holdings, LLC decides to replace the existing boilers in the future, will the new boilers be subject to the New Source Review process?

**Response to Comment 16:**

Existing sources sometimes wish to change or add an emission unit(s) or pollution control unit, or otherwise alter their manner or scale of operations. These changes can sometimes be so insignificant as to be exempt from IDEM approval requirements, or may only require that the source notify IDEM that certain "notice-only" changes were made.

On the other hand, the changes may be extensive enough that the source must request a permit or source modification from IDEM prior to making the desired changes. Any such approved changes could further result in a change to the source's source category or its potential to emit that is substantial enough to require that the operating permit itself may need to be changed to the next higher, or lower, level. More information is available at IDEM's website at <http://www.in.gov/idem/permits/guide/air/index.html>

There are no changes to the permit due to this comment.

**Comment 17:**

The incidences of both leukemia and lymphoma in Elkhart County are already much higher than the national average. According to the EPA's website, styrene may be linked to both leukemia and lymphoma. Please consider denying the requested permit at least until the EPA has had a chance to complete their Integrated Risk Information System review of styrene as a potential carcinogen.

**Response to Comment 17:**

According to the U.S. EPA, "Several epidemiologic studies suggest that there may be an association between styrene exposure and an increased risk of leukemia and lymphoma. However, the evidence is inconclusive due to multiple chemical exposures and inadequate

information on the levels and duration of exposure."  
 If an applicant demonstrates that they will be able to comply with all current and applicable Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit.

There are no changes to the permit due to these comments.

**Comment 18:**

Is there any one who keeps track of cumulative emissions in a community? Our manufacturing base is largely related to recreational vehicles, so I imagine that many companies have hazardous air emissions. Even if these emission decrease to the limits IDEM recommends, does the cumulative effect of all these emissions harm us? In addition, is IDEM ever concerned about the number of air emission permits in a community?

**Response to Comment 18:**

IDEM conducts sampling of the ambient air at monitoring stations around Indiana. This air monitoring measures whether the NAAQS are being met. Information about Indiana's air monitoring system and monitoring results are available at <http://www.in.gov/idem/programs/air/amb/index.html>. Information about current and expected air pollution levels are on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

In addition, IDEM, OAQ, performed air toxics monitoring of 62 different VOC's, many of which are also HAPs, at the Pierre Moran School, in Elkhart County from May 1999 to December 2007. According to the Indiana 2008 Ambient Air Monitoring Annual Network Plan, no significant problems or dangerous levels of toxics have been discovered in this area.

There are no changes to the permit due to these comments.

On February 25, 2008, Lauren Pecina of Bruce Carter Associates, LLC submitted the following comment on behalf of Tocon Holdings, LLC to IDEM, OAQ on the draft New Source Construction and Federally Enforceable State Operating Permit (FESOP).

**Comment 19:**

Please revise the tables found in the FESOP quarterly reports for VOC/HAP emissions as follows:

...

Month	Column 1				Column 2	Column 1 + Column 2
	Single HAP Emissions This Month				Single HAP Emissions Previous 11 Months	Single HAP Emissions 12 Month Total
	Resins	Gel Coats	Catalysts	Solvents		

...

Month	Column 1				Column 2	Column 1 + Column 2
	VOC Emissions This Month				VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
	Resins	Gel Coats	Catalysts	Solvents		

...

**Response to Comment 19:**

IDEM agrees with the recommended changes. The permit has been revised as requested above.

### Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) The emission unit description for booth EU02 contained in Section A.2 and D.1 has been revised. The description in the permit incorrectly stated that the booth would use a dry filter for particulate control and exhausted to stacks S1, S2 and S3. However, no particulate is generated by the emission unit and the unit exhausts to the indoors.

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

...

- (b) One (1) custom hand-lay fiberglass resin and gel coat open molding booth, identified as EU02, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a manual hand roller, ~~and a dry filter for particulate control,~~ and exhausting to ~~stacks S1, S2, and S3~~ **the indoors**.

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (b) One (1) custom hand-lay fiberglass resin and gel coat open molding booth, identified as EU02, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a manual hand roller, ~~and a dry filter for particulate control,~~ and exhausting to ~~stacks S1, S2, and S3~~ **the indoors**.

...

### IDEM Contact

- (a) Questions regarding this proposed New Source Construction and FESOP can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5375) or toll free at 1-800-451-6027 extension (4-5375).
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

*Minor Source Criteria Pollutant Modeling  
Screening Form - Raw Data*

**Permit Summary**

Permit Number: 039-25468-00671  
 Company Name: Tocon Holdings, LLC  
 Source Location: 1302 East Monroe Street, Goshen, IN 46528  
 County: Elkhart  
 SIC Code: 3799  
 Permit Reviewer: Brian Williams

**Source Specific Information**

**TABLE 1 - Pollutant Emission Rates (lb/hr) - based on the highest allowable emissions rate**

Unit ID	Stack ID	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
EU01	S1, S2, S3	0	0	2.45	0	0
EU03	S4	0	0	0.12	0	0
B01	S7	0.983	1.17	0.089	5.85E-06	0.007
B02	S8	0.983	1.17	0.089	5.85E-06	0.007
<b>Max. Emissions Rate (lb/hr):</b>		<b>1.966</b>	<b>2.34</b>	<b>2.748</b>	<b>0.0000117</b>	<b>0.014</b>

**TABLE 2 - Stack Information: (all heights are from ground level)**

For non-circular stacks, take the average of the stack dimensions as the stack diameter.  
 If there is no building near the stack, zero out the building height, width, and length.

Stack ID	Stack Height (ft)	Flow Rate (acfm)	Stack Temp. (°F)	Stack Diameter (ft)	Closest building related to stack:			Closest Property Line (ft)
					Height (ft)	Width (ft)	Length (ft)	
S1, S2, S3	22	13000	68	4.875	20	491	607	126.92
S4	30	18000	68	0.67	20	491	607	314.75
S7	30	10000	450	1.5	20	491	607	296.15
S8	30	10000	450	1.5	20	491	607	296.15

*Minor Source Criteria Pollutant Modeling*  
*SCREEN3 Data*

**Permit Summary**

Permit Number: 039-25468-00671  
 Company Name: Tocon Holdings, LLC  
 Source Location: 1302 East Monroe Street, Goshen, IN 46528  
 County: Elkhart  
 SIC Code: 3799  
 Permit Reviewer: Brian Williams

**SCREEN3 Modeling Data**

**TABLE 3 - Pollutant Modeling Data - grams per second**

Pollutant:	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
<i>Totals (g/s):</i>	0.247716	0.29484	0.346248	1.4742E-06	0.001764

**TABLE 4 - Stack Modeling Data**

The M-Value is calculated using a unit emission rate of 1 g/s.  
 The stack with the lowest M value represents the lowest dispersion coefficient and should be modeled.

Stack ID	Stack Height (m)	Stack Gas Velocity (m/s)	Stack Temp. (K)	Stack Diameter (m)	Closest building related to stack:			Closest Property Line (m)	Volumetric Flow Rate (m <sup>3</sup> /s)	Stack M-Value
					Height (m)	Width (m)	Length (m)			
S1, S2, S3	6.707317073	3.540783407	293.15	1.486280488	6.097560976	149.695122	185.0609756	38.69512195	6.143159777	6962.065374
S4	9.146341463	259.5542526	293.15	0.204268293	6.097560976	149.695122	185.0609756	95.96036585	8.505913537	695929.8398
S7	9.146341463	28.76886518	505.37	0.457317073	6.097560976	149.695122	185.0609756	90.28963415	4.725507521	132978.5243
S8	9.146341463	28.76886518	505.37	0.457317073	6.097560976	149.695122	185.0609756	90.28963415	4.725507521	132978.5243

## Minor Source Criteria Pollutant Modeling Screening Form - Modeling Results

### Permit Summary

Permit Number: 039-25468-00671  
 Company Name: Tocon Holdings, LLC  
 Source Location: 1302 East Monroe Street, Goshen, IN 46528  
 County: Elkhart  
 SIC Code: 3799  
 Permit Reviewer: Brian Williams

### Modeling Method

Model Used (please check one):

SCREEN3     AERSCREEN  
 ISC3         AERMOD

Date Modeling Completed: 3/17/2008

Modeler: Brian Williams

### Modeling Results

**TABLE 5 - Pollutants Modeling Results: 1 Hour Concentration ( $\mu\text{g}/\text{m}^3$ ):**

The modeled concentrations in this table are the 1-hour concentrations for each pollutant. Use tables 6 and 7 to compare the modeled data to the air quality standard.

Pollutant:	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
Concentration ( $\mu\text{g}/\text{m}^3$ ):	857.9	1021	1198	5.09E-03	6.09

**TABLE 6 - Pollutants Maximum Concentration ( $\mu\text{g}/\text{m}^3$ ):**

Averaging Period	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
1-hour modeled concentration	857.9				
<b>NAAQ Standard</b>	<b>40000</b>				
<b>PASS or FAIL</b>	PASS				
3-hour modeled concentration					5.481
<b>NAAQ Standard</b>					<b>1300</b>
<b>PASS or FAIL</b>					PASS
8-hour modeled concentration	600.53				
<b>NAAQ Standard/CEP Benchmark</b>	<b>10000</b>				
<b>PASS or FAIL</b>	PASS				
24-hour modeled concentration			479.2	0.0020352	2.436
<b>NAAQ Standard</b>			<b>150</b>	<b>1.5</b>	<b>365</b>
<b>PASS or FAIL</b>			FAIL	PASS	PASS
Annual modeled concentration		81.68	95.84		0.4872
<b>NAAQ Standard/CEP Benchmark</b>		<b>100</b>	<b>50</b>		<b>80</b>
<b>PASS or FAIL</b>		PASS	FAIL		PASS

## Air Quality Analysis for TOCON Holdings, LLC

### Goshen, Indiana (Elkhart County)

#### Proposed Project

TOCON Holdings, LLC has applied for New Source Construction and Federally Enforceable State Operating Permit (FESOP). The potential to emit after issuance for all criteria pollutants are all lower than 100 tons per year, so it is not a major PSD source. The residents of the nearby area are concerned about the health impacts from PM10 and styrene emission, so the modeling for PM10 and refined HAP modeling for styrene were performed.

#### Analysis Summary

The results of PM10 modeling show that there is no location beyond the facility boundaries with modeled concentrations greater than the NAAQS limits. The results of styrene modeling showed that there is no location beyond the facility boundary with modeled concentrations greater than evaluation indexes for non-cancer acute and chronic hazard screening analysis suggested by IDEM. Therefore, there should be no adverse health impacts from the new construction project.

#### Emissions Sources

The following source information was modeled:

**Table I Source Information**

Source ID	Emission, TPY		Stack	Stack	Stack	Stack
	PM10	Styrene	Height	Diameter	Temperature	Flow Rate
			Feet	Feet	°F	acfm
EU01S1	3.58	13.45	22	4.875	68	13,000
EU01S2	3.58	13.45	22	4.875	68	13,000
EU01S3	3.58	13.45	22	4.875	68	13,000
EU03S4	0.53		30	0.67	68	18,000
B01	0.39		30	1.5	450	10,000
B01	0.39		30	1.5	450	10,000
<b>Total</b>	<b>12.04</b>	<b>40.35</b>				

Met Data, Model Used, Receptor Grid and Terrain
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### Meteorological Data

The meteorological data used in AERMOD consisted of 1988 through 1992 surface data from South Bend, Indiana and upper air measurements taken at Peoria, Illinois. The meteorological data used is the most representative data for modeling the facility in Elkhart County due to the close proximity of the site. These data were obtained from the IDEM web site and were preprocessed using AERMET.

### Model Description

AERMOD, Version 07026, was used to determine maximum off-property concentrations or impacts for each pollutant. All regulatory default options were utilized in the U.S. EPA approved model, as listed in 40 Code of Federal Regulations Part 51, Appendix W "Guideline on Air Quality Models".

### Receptor Grid

OAQ modeling used the following receptor grids which contain over 1,017 individual receptors.

- 100 meter spacing from fence line to 1000 meters from fence line,
- 200 meters spacing from 1000 meters from fence line to 2,000 meters from the facility fence line.

### Treatment of Terrain

Receptor terrain elevation inputs were interpolated from DEM (Digital Elevation Model) data obtained from the USGS. DEM terrain data was preprocessed using AERMAP. The terrain files that were used in the terrain analysis can be found on the IDEM web site.

### Modeling Results

The modeling results are listed as following:

**Table II Modeling Results**

Year	Modeling Concentration, $\mu\text{g}/\text{M}^3$			
	PM10		Styrene	
	Annual Average	24 Hour Average	Annual Average	24 Hour Average
1988	20.05	104.59	65.26	397.63
1989	19.47	101.00	69.62	385.13
1990	21.17	102.38	68.96	389.22
1991	19.57	93.96	67.06	368.72
1992	17.97	97.47	61.52	365.26

HAPs Analysis
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A HAPs analysis was performed based on the request of residents in the nearby area.

OAQ currently requests data concerning the emissions of 189 HAPs listed in the 1990 Clean Air Act Amendments (CAAA) that are either carcinogenic, or otherwise considered toxic, and may be used by industries in the State of Indiana. These substances are listed as air toxic compounds on the State of Indiana, Department of Environmental Management, Office of Air Quality's construction permit application Form GSD-08.

According to the new guidelines, the HAP analysis was completed comparing the maximum estimated concentrations of each pollutant with the Unit Risk Factor (URF) for carcinogenic HAPs, and inhalation risk evaluation for non-cancer causing HAPs. This analysis offers a refined, up-to-date site specific analysis that takes into account the different potencies and health effects that each pollutant presents to the public.

The URF is the upper-bound excess lifetime cancer risk estimated to result from continuous inhalation exposure to a pollutant over a 70 year lifetime. Multiplying the estimated concentration by the URF will produce a cancer risk estimate. The cancer risk estimate is the conservative probability of developing cancer from exposure to a pollutant or a mixture of pollutants over a 70 year lifetime, usually expressed as the number of additional cancer cases in a given number of people, e.g., one in a million.

Non-cancer health effects are determined by using Minimum Risk Level (MRL) for acute effects and the Reference Concentration (RfC) for chronic effects. A MRL is an estimate of the daily human exposure to a hazardous substance that is likely to be without appreciable risk of adverse non-cancer health effects over a specified duration of exposure. IDEM will take the maximum 24-hour modeled HAP concentration at or beyond the property boundary of the source and compare it to the appropriate MRL. The RfC is an estimate of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. Dividing the estimated pollutant concentration by the RfC will determine the pollutant's Hazard Quotient (HQ).

$$\text{HQ} = \text{Modeled Maximum Annual Concentration} / \text{RfC}$$

The modeling results and related evaluation index are listed in Table III. The highest 24-hour average concentration is not over the evaluation index MRL and the annual average concentration is not over the RfC. The HI of styrene is 0.073, less than the threshold of 1. Styrene is not a carcinogenic HAP, so no carcinogenic risk analysis is performed. No adverse health impacts are expected from the facility.

**Table III HAP Modeling Results**

HAP	Average Period	Maximum Concentration	Type of Guidance Threshold	Guidance Threshold	Hazard Quotient	Predicted Risk	Complies With Indexes
		ug/M <sup>3</sup>		ug/M <sup>3</sup>		NA*	
Styrene	24-hour	397.63	MRL	12000			Yes, Cmax < MRL
	Annual	69.92	RfC	1000	0.07		Yes, HQ < 1

\* - Styrene is not a carcinogenic HAP, so no risk analysis is needed.

## Summary

Dispersion modeling was performed based on the source data provided by the company. The results of PM10 modeling showed that there is no location beyond the facility boundary with modeled concentrations greater than the NAAQS limits. The results of styrene modeling showed that there is no location beyond the facility boundary with modeled concentrations greater than evaluation indexes for non-cancer acute and chronic hazard screening analysis suggested by IDEM. Therefore, there should be no adverse health impacts from the new project.

Figure I: 1988 24 Hour Average PM10 concentration Distribution.

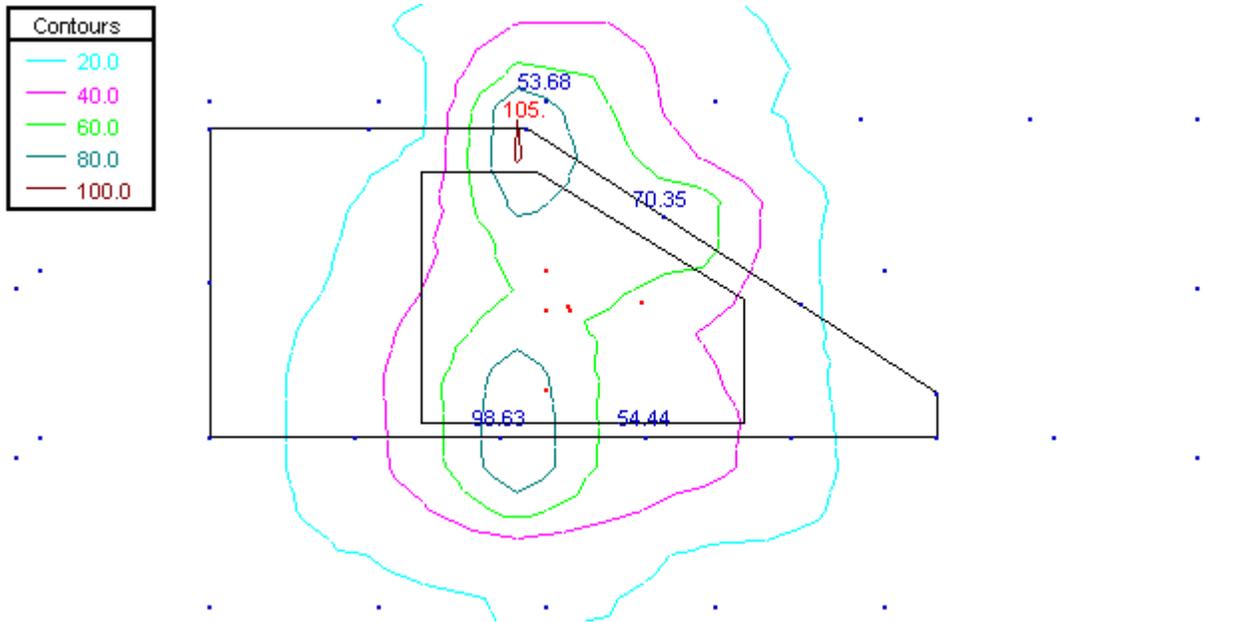


Figure II 1990 Annual Average PM10 concentration Distribution.

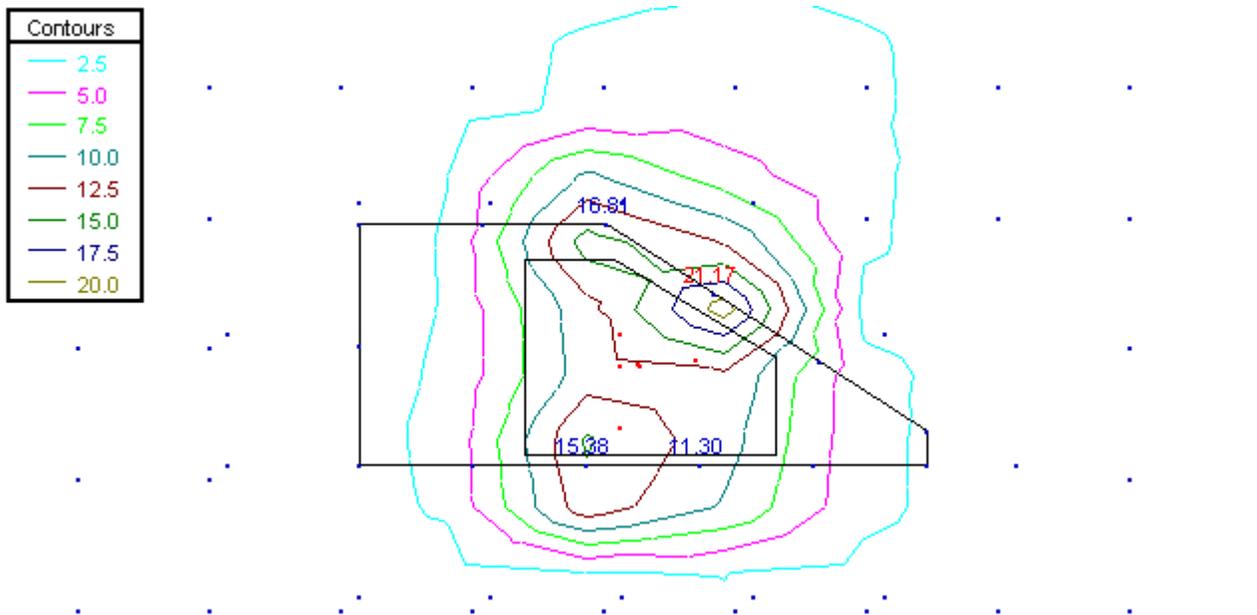


Figure III: 1989 24 Hour Average Styrene concentration Distribution.

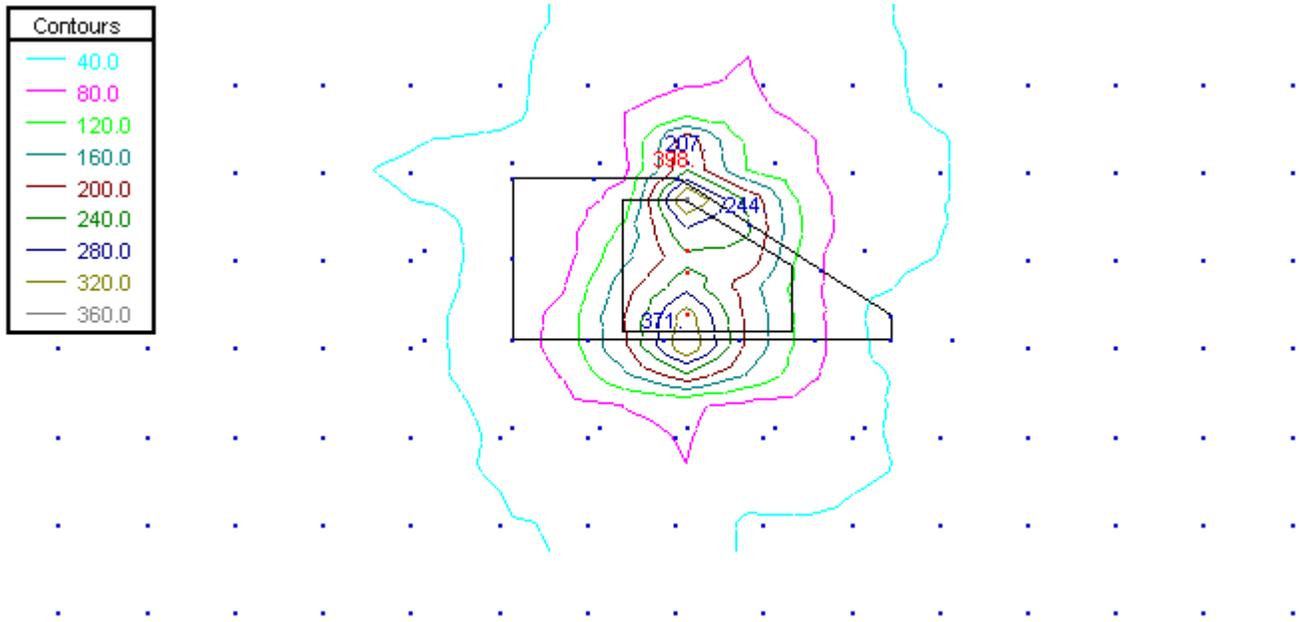
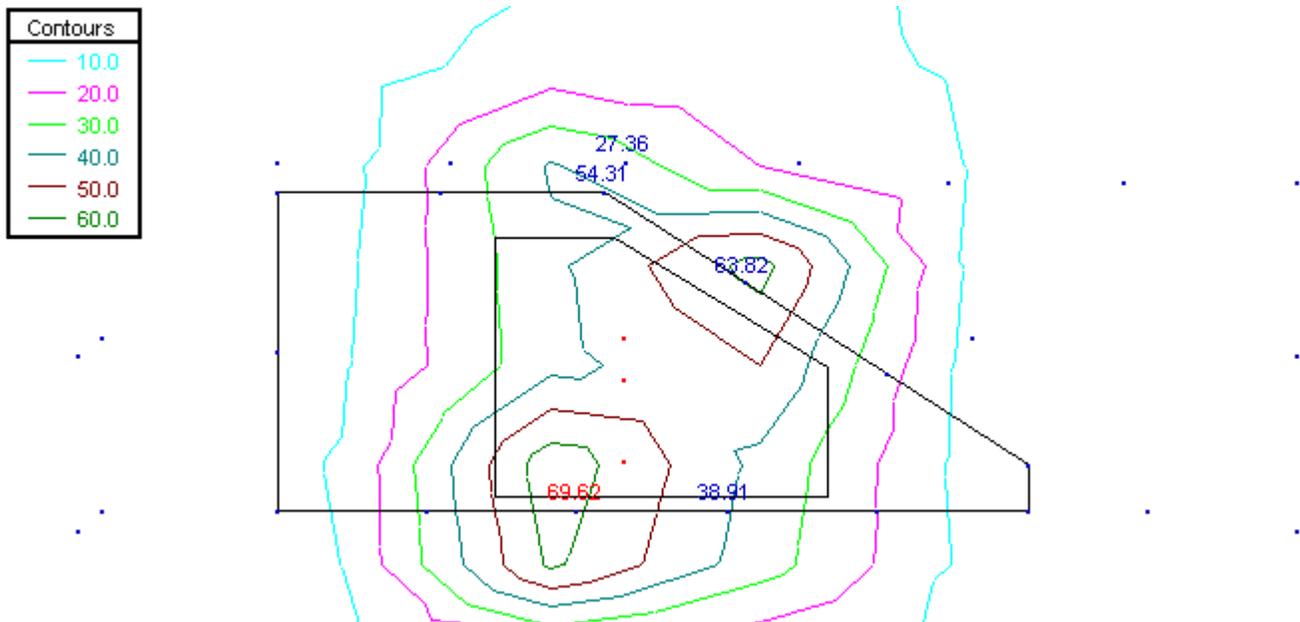


Figure IV: 1990 Annual Average Styrene concentration Distribution.



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

#### Source Description and Location

**Source Name:** Tocon Holdings, LLC  
**Source Location:** 1302 East Monroe Street, Goshen, Indiana 46528  
**County:** Elkhart  
**SIC Code:** 3799  
**Operation Permit No.:** F 039-25468-00671  
**Permit Reviewer:** Brian Williams

On October 29, 2007, the Office of Air Quality (OAQ) has received an application from Tocon Holdings, LLC related to the construction of a new fiberglass part manufacturing plant.

#### Existing Approvals

There have been no previous approvals issued to this source.

#### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	attainment
PM2.5	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are

considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Elkhart County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Other Criteria Pollutants  
Elkhart County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Tocon Holdings, LLC on October 29, 2007, relating to the construction of a new fiberglass part manufacturing plant. This facility was previously owned by Johnson Controls, Inc. and permitted under MSOP No: 039-17604-00018 issued on January 30, 2004. On September 19, 2007, this MSOP was revoked because Johnson Controls, Inc. relinquished ownership of the facility. However, on September 19, 2007, Johnson Controls, Inc. was issued Exemption No: 039-25099-00018 for six air strippers associated with a groundwater remediation system at the source.

The following is a list of the new emission unit(s) and pollution control device(s):

- (a) One (1) custom fiberglass resin and gel coat open molding booth, identified as EU01, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a non-atomized flow coater and a dry filter for particulate control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) custom hand-lay fiberglass resin and gel coat open molding booth, identified as EU02, approved for construction in 2008, with a maximum capacity of 1 part per hour, using a manual hand roller, and exhausting to the indoors.
- (c) One (1) custom grinding, sanding, and surface grinding booth using hand-held equipment, identified as EU03, approved for construction in 2008, with a maximum capacity of 9.53 pounds per day, using a dry filter for particulate control and exhausting to stack S4.
- (d) Insignificant activities consisting of the following:
  - (1) Activities performed using hand-held equipment, including the following:
    - (a) sanding, which vents to the indoors.
  - (2) Cleaners and solvents, where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months;

The following boilers previously belonged to Johnson Controls, Inc. and were permitted under MSOP No: 039-17604-00018. The boilers now belong to Tocon Holdings, LLC and are being permitted here. Therefore, the source consists of the following permitted emission unit(s):

- (a) Two (2) natural gas-fired boilers, identified as B01 and B02, constructed in 1969 and 1977 respectively, with a heat input capacity of 11.7 million British thermal units per hour, each, and exhausting to stacks S7 and S8.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this source.

<b>Emission Calculations</b>
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See Appendix A of this TSD for detailed emission calculations.

<b>Permit Level Determination – FESOP</b>
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The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	115.85
PM10 <sup>(1)</sup>	116.43
SO <sub>2</sub>	0.06
NO <sub>x</sub>	10.25
VOC	45.38
CO	8.61

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

HAPs	Potential To Emit (tons/year)
Styrene	40.37
Methyl Methacrylate	4.11
Other HAPs	0.19
<b>TOTAL HAPs</b>	<b>44.67</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of particulate matter with a diameter less than ten (10) micrometers (PM10) is greater than or equal to one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The PTE (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally

Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

**PTE of the Entire Source After Issuance of the FESOP**

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, 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 of the Entire Source After Issuance of FESOP (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
EU01	10.75	10.75 <sup>(3)</sup>	0.00	0.00	24.0 <sup>(2)</sup>	0.00	13.33	9.22 <sup>(1)</sup> Styrene
EU02	0.00	0.00	0.00	0.00	0.15	0.00		
EU03	5.22	5.22	0.00	0.00	0.00	0.00	0.00	0.00
B-01, B-02	0.19	0.78	0.06	10.25	0.56	8.61	0.19	1.84E-01 Hexane
Hand Held Sanding (Insignificant Activity)	2.95	2.95	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total PTE of Entire Source</b>	<b>19.11</b>	<b>19.69</b>	<b>0.06</b>	<b>10.25</b>	<b>24.71</b>	<b>8.61</b>	<b>13.52</b>	<b>less than 10.0</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.  
 \*\* negl. = negligible

(a) FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The total usage of resins, gel coats, catalysts, and solvents used in booths EU01 and EU02 shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.22 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (2) The total usage of resins, gel coats, catalysts, and solvents used in booth EU01, shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (3) Through the use of a dry particulate filter for control, booth EU01 will limit the potential to emit (PTE) of PM10 to less than 100 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential to emit PM10, VOC, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than one hundred (100) tons per 12 consecutive month period, VOC to less than one hundred (100) tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)), 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities), and 40 CFR 63, Subpart WWWW not applicable.

- (b) PSD Minor Source  
This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

- (a) The requirements of New Source Performance Standard 40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for boilers B01 and B02 because B01 and B02 were constructed prior to the June 19, 1984 applicability date and have a maximum heat input capacity that is less than 100 MMBtu per hour.
- (b) The requirements of New Source Performance Standard 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for boilers B01 and B02, because these boilers were constructed prior to the June 9, 1989 applicability date.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

##### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAPs), 326 IAC 20-48 (40 CFR 63.5683, Subpart VVVV (Boat Manufacturing)), are not included in this permit because this source does not manufacture boats.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-56 (40 CFR 63.5785, Subpart WWWW (Reinforced Plastic Composites Production)), are not included in this permit because this source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted, such that the potential to emit of any single HAP is limited to less than 10 tons per year and the potential to emit of any combination of HAPs is limited to less than 25 tons per year.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 326 IAC 20 and 40 CFR Part 61, 63) included in this permit.

### Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

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

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the new units is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new units to 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, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 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 this permit:
- (1) 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.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 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.

### Fiberglass Booths

- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(6), booth EU02 is exempt from the requirements of 326 IAC 6-3 since the resins and gel coats are applied using a manual hand roller. Pursuant to 326 IAC 6-3-

2(d), particulate from booth EU01 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6, this rule applies to new facilities, which have potential VOC emissions of 25 tons or greater per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8. The custom hand-lay fiberglass resin and gel coat booth (EU02) is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because it has the potential to emit VOC of less than twenty-five (25) tons per year. The custom fiberglass reinforced plastic component resin and gel coat booth (EU01) has a potential to emit VOC greater than twenty-five (25) tons per year. However, the source shall limit the potential to emit of VOC from booth EU01 to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, booth EU01 shall be limited as follows:

- (1) The total usage of resins, gel coats, catalysts, and solvents used in booth EU01, shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the booth EU01 to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (j) 326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)  
Pursuant to 326 IAC 20-25, this rule applies to facilities, which emit or have the potential to emit ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs and that meet all of the following criteria:

- (1) Manufacture reinforced plastics composites parts, products, or watercraft.  
(2) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.  
(3) Have actual emissions of styrene equal to or greater than three (3) tons per year.

This source has the potential to emit ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs and meets the above criteria. However, the requirements of 326 IAC 20-25 are not applicable, because the source has accepted to limit its potential to emit HAPs from the entire source to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 20-25 are not applicable.

- (k) 326 IAC 20-48 (Emissions Standards for Hazardous Air Pollutants from Boat Manufacturing)  
This rule applies to sources as provided in 40 CFR 63.5683, Subpart VVVV. The requirements of 326 IAC 20-48 are not applicable to this source because it does not manufacture boats.
- (l) 326 IAC 20-56 (Reinforced Plastic Composites Production)  
This rule applies to sources as provided in 40 CFR 63.5785, Subpart WWWW. In order to render the requirements of 326 IAC 20-56 not applicable, the potential to emit HAPs from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for any combination of HAPs.

Natural Gas-Fired Boilers

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

- (1) The natural gas-fired boiler B01 is subject to 326 IAC 6-2 because it was constructed prior to June 8, 1972 and is a source of indirect heating. Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from this boiler (B01) must be calculated using the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

- C = maximum ground level concentration with respect to distance from the point source at "critical" wind speed for level terrain (50).  
P<sub>t</sub> = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).  
Q = total source operating capacity (1 boiler with a heat input of 11.7 MMBtu/hour, for a total of 11.7 MMBtu/hr)  
N = number of stacks in fuel burning operation (1)  
a = 0.67 rise factor  
h = stack height (1 stack 30 feet high)

$$P_t = \frac{(50) (0.67) (30)}{(76.5) (11.7)^{0.75} (1)^{0.25}}$$

$$P_t = 2.08 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes, which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input. Based on the calculations below, B01 can comply with this limit.

$$\frac{(1.9 \text{ lb PM}) (\text{MM SCF})}{(\text{MM SCF}) (1,020 \text{ MMBtu})} = 0.0019 \text{ lb/MMBtu}$$

- (2) The natural gas-fired boiler B02 is subject to 326 IAC 6-2-3 because it was constructed after June 8, 1972 and prior to September 21, 1983 and is a source of indirect heating. Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from this boiler must be calculated using the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

- C = maximum ground level concentration with respect to distance from the point source at "critical" wind speed for level terrain (50).  
P<sub>t</sub> = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).  
Q = total source operating capacity (2 boilers with a heat input of 11.7 MMBtu/hour each, for a total of 23.4 MMBtu/hr)  
N = number of stacks in fuel burning operation (2)  
a = 0.67 rise factor  
h = stack height (2 stacks 30 feet high)

$$P_t = \frac{(50) (0.67) (30)}{(76.5) (23.4)^{0.75} (2)^{0.25}}$$

$$P_t = 1.04 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes, which has 250 MMBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. Based on the calculations below, B02 can comply with this limit.

$$\frac{(1.9 \text{ lb PM}) (\text{MM SCF})}{(\text{MM SCF}) (1,020 \text{ MMBtu})} = 0.0019 \text{ lb/MMBtu}$$

- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 The boilers (B01 and B02) are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (o) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)  
 This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from B01 and B02 is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (p) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
 The boilers (B01 and B02), are each not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty-five (25) tons per year.
- (q) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)  
 The boilers (B01 and B02), are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.
- (r) 326 IAC 10-1-1 (Nitrogen Oxides Control)  
 The boilers (B01 and B02), are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Grinding, Sanding, and Surface Grinding Activities

- (s) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b)(13), the hand-held grinding, sanding, and surface grinding equipment used in at this source are exempt from the requirements of 326 IAC 6-3, because they are defined as a trivial activities pursuant to 326 IAC 2-7-1(40)(F)(vi), (x), and (xii).

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
EU01	Filter Check	Once per day
EU01	Overspray Observations	Once per week
EU01	Stack Exhaust Observations	Once per month

- (b) There are no testing requirements applicable to this source.

### Conclusion and Recommendation

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 October 29, 2007.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 039-25468-00671. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the findings is available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).

**Appendix A: Emissions Calculations  
Summary of Emissions**

**Company Name:** Tocon Holdings, LLC  
**Address City IN Zip:** 1302 East Monroe Street, Elkhart, IN 46528  
**Permit Number:** 039-25468-00671  
**Reviewer:** Brian Williams

<b>Unlimited Potential to Emit Before Controls (PTE) (tons/yr)</b>								
<b>Process</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Single HAP</b>	<b>Total HAPs</b>
EU01	107.48	107.48	0.00	0.00	44.66	0.00	40.23 Styrene	44.32
EU02	0.00	0.00	0.00	0.00	0.15	0.00	0.14 Styrene	0.15
EU03	5.22	5.22	0.00	0.00	0.00	0.00	0.00	0.00
B-01, B-02	0.19	0.78	0.06	10.25	0.56	8.61	0.184 Hexane	0.19
Hand Held Sander	2.95	2.95	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>115.85</b>	<b>116.43</b>	<b>0.06</b>	<b>10.25</b>	<b>45.38</b>	<b>8.61</b>	<b>40.37</b>	<b>44.67</b>

<b>Limited Potential to Emit After Issuance (PTE) (tons/yr)</b>								
<b>Process</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Single HAP</b>	<b>Total HAPs</b>
EU01	10.75	10.75	0.00	0.00	shall not exceed 24.0	0.00	shall not exceed 9.22	13.33
EU02	0.00	0.00	0.00	0.00	0.15	0.00		
EU03	5.22	5.22	0.00	0.00	0.00	0.00	0.00	0.00
B-01, B-02	0.19	0.78	0.06	10.25	0.56	8.61	0.184 Hexane	0.19
Hand Held Sander	2.95	2.95	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>19.11</b>	<b>19.69</b>	<b>0.06</b>	<b>10.25</b>	<b>shall not exceed 24.71</b>	<b>8.61</b>	<b>less than 10.0</b>	<b>13.52</b>

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Open Molding Operations\***  
**Resin and Gel Usage**

**Company Name: Tocon Holdings, LLC**  
**Address City IN Zip: 1302 East Monroe Street, Elkhart, IN 46528**  
**Permit No. 039-25468-00671**  
**Reviewer: Brian Williams**

Material (Resin or Gel Name)	Material ID	Density (Lb/Gal)	Weight % Styrene/VOC	Weight % MME/VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	*UEF (lbs Styrene/ton resin or gel)	*UEF (lbs MME/ton of gel)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Potential Styrene (pounds per day)	Potential Styrene (tons per year)	Potential MME (pounds per day)	Potential MME (tons/yr)	Transfer Efficiency	Potential PM/PM10 (tons/year)	Control Efficiency	Potential PM/PM10 After Controls (tons/yr)
<b>Custom Fiberglass Booth (EU01) Resin and Gel Coats</b>																		
Polyester Resin Solution (non-atomized)	H834-RLC-20	9.17	35.00%	0.00%	12.50	1,000	77	0.00	105.91	19.33	105.91	19.33	0.00	0.00	75%	81.58	90%	8.16
Black Neo Gel-Kote (non-atomized)	GG6-5013	9.59	40.00%	4.00%	3.25	1,000	259	60	119.31	21.77	96.87	17.68	22.44	4.10	75%	19.11	90%	1.91
Dion Tooling Resin (non-atomized)	6631-00	8.84	49.00%	0.00%	1.38	1,000	121	0.00	17.65	3.22	17.65	3.22	0.00	0.00	75%	6.79	90%	0.68
MEKP9 Catalyst		9.17	2.40%	0.00%	0.35	1,000	0.00	0.00	1.85	0.34	0.00	0.00	0.00	0.00	75%	0.00	90%	0.00
<b>Total VOC/HAP and PM from EU01 Resin and Gel Use</b>									<b>244.72</b>	<b>44.66</b>	<b>220.43</b>	<b>40.23</b>	<b>22.44</b>		<b>107.48</b>		<b>10.75</b>	
<b>Custom Fiberglass Booth (EU02) Resin and Gel Coats</b>																		
Polyester Resin Solution (hand-layed)	H834-RLC-20	9.17	35.00%	0.00%	0.05	1,000	94	0.00	0.52	0.09	0.52	0.09	0.00	0.00	100%	0.00	90%	0.00
Black Neo Gel-Kote (hand-layed)	GG6-5013	9.59	40.00%	4.00%	0.01	1,000	220	60	0.32	0.06	0.25	0.05	0.07	0.01	100%	0.00	90%	0.00
<b>Total VOC/HAP and PM from EU02 Resin and Gel Use</b>									<b>0.84</b>	<b>0.15</b>	<b>0.77</b>	<b>0.14</b>	<b>0.07</b>		<b>0.01</b>		<b>0.00</b>	
<b>Total Combined VOC/HAP and PM from Resin and Gel Use</b>									<b>245.56</b>	<b>44.81</b>	<b>221.20</b>	<b>40.37</b>	<b>22.51</b>		<b>107.48</b>		<b>10.75</b>	

**METHODOLOGY**

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

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

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

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

Potential HAP (lb/day) = Density (lb material /gal material) \* Gal. of material (gal material/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential HAP (ton/year) = Potential HAP (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: Emissions Calculations  
Grinding, Sanding, and Surface Grinding Operations**

**Company Name: Tocon Holdings, LLC  
Address City IN Zip: 1302 East Monroe Street, Elkhart, IN 46528  
Permit Number: 039-25468-00671  
Reviewer: Brian Williams**

<b>EU03 Grinding, Sanding, and Surface Grinding Booth</b>								
Process	Material Grinded (ft <sup>2</sup> /day)	PM/PM10 Emission Factor (lbs/ft <sup>2</sup> )	Material Removed (lbs/day)	Control Efficiency %	Uncontrolled PM/PM10 PTE (lbs/hr)	Uncontrolled PM/PM10 PTE (tons/yr)	Controlled PM/PM10 PTE (lbs/hr)	Controlled PM/PM10 PTE (tons/yr)
Grinding	7.056	1.35	9.53	90.00%	0.40	1.74	0.04	0.17
Sanding	7.056	1.35	9.53	90.00%	0.40	1.74	0.04	0.17
Surface Grinding	7.056	1.35	9.53	90.00%	0.40	1.74	0.04	0.17
<b>Total</b>						<b>5.22</b>		<b>0.52</b>

**Methodology**

No AP-42 emission factors exist for handheld grinding, sanding, and surface grinding of fiberglass parts  
Emission Calculations provided by source

Material Removed (lbs/day) = Material Grinded (ft<sup>2</sup>/day) x PM/PM10 Emission Factor (lbs/ft<sup>2</sup>)

Uncontrolled PM/PM10 (tons/yr) = Material Removed (lbs/day) / 24 (day/hrs) \* 8760 (hrs/yr) \* 1/2000 (ton/lbs)

Controlled PM/PM10 (tons/yr) = Material Removed (lbs/day) / 24 (day/hrs) \* (1- %Control Efficiency ) \* 8760 (hrs/yr) \* 1/2000 (ton/lbs)

<b>Hand Held Sanding</b>						
Process	Material Sanded (ft <sup>2</sup> /hr)	Material Removed (ft)	Material Removed (ft <sup>3</sup> /hr)	Density (lbs/ft <sup>3</sup> )	Uncontrolled PM/PM10 PTE (lbs/hr)	Uncontrolled PM/PM10 PTE (tons/yr)
Sanding	2.00	0.0026	0.005	129.6	0.67	2.95
<b>Total</b>						<b>2.95</b>

**Methodology**

No AP-42 emission factors exist for handheld grinding, sanding, and surface grinding of fiberglass parts  
Emission Calculations provided by source

Material Removed (ft<sup>3</sup>/hr) = Material Sanded (ft<sup>2</sup>/hr) x Material Removed (ft)

Uncontrolled PM/PM10 (tons/yr) = Material Removed (ft<sup>3</sup>/hr) \* Density (lbs/ft<sup>3</sup>) \* 8760 (hrs/yr) \* 1/2000 (ton/lbs)

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

**Company Name:** Tocon Holdings, LLC  
**Address City IN Zip:** 1302 East Monroe Street, Elkhart, IN 46528  
**Permit Number:** 039-25468-00671  
**Reviewer:** Brian Williams

Heat Input Capacity                      Potential Throughput  
MMBtu/hr                                      MMCF/yr  
  
23.4                                      205.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.19	0.78	0.06	10.25	0.56	8.61

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.15E-04	1.23E-04	7.69E-03	1.84E-01	3.48E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.12E-05	1.13E-04	1.43E-04	3.89E-05	2.15E-04

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