



DATE: April 9, 2008

TO: Interested Parties / Applicant

RE: M.L. Moody, Inc. dba Fiberglass Engineering and Design / R097-25596-00635

FROM: Timothy J. Method  
Environmental Coordinator

## Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

April 9, 2008



Michael L. Moody  
M.L. Moody, Inc. dba Fiberglass Engineering and Design  
P.O. Box 34154  
Indianapolis, IN 46234

Certified Mail Number: 7007 0710 0005 3965 6756

Re: Registered Construction and Operation Status,  
**R097-25596-00635**

Dear Mr. Moody:

The application from M.L. Moody, Inc. dba Fiberglass Engineering and Design, received on November 28, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following stationary mass transit cosmetic interior components manufacturer located at 7421 Crawfordsville Rd., Indianapolis, IN 46214 is classified as registered:

- (a) One (1) open mold fabrication process, constructed in 1984. The mold fabrication area is ventilated by a dedicated exhaust fan equipped with particulate filters for capture of particulate matter. Mold fabrication activities include manual hand application of resins and manual cup gun application of gelcoats.

The following conditions shall be applicable:

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:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.
2. 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.

This registration is the first approval issued to this source. The source may operate according to 326 IAC 2-5.1.



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Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice 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

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by

Timothy J. Method  
Environmental Coordinator  
Department of Public Works

**AB/EVP**

cc: File  
Air Compliance – Matt Mosier  
Enforcement – Cheryl Carlson  
IDEM, OAQ – Mindy Hahn  
Marion County Health Department

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

<b>Company Name:</b>	<b>M.L. Moody, Inc. dba Fiberglass Engineering and Design</b>
<b>Address:</b>	<b>7421 Crawfordsville Rd., Indianapolis, IN 46214</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Phone #:</b>	<b>(317) 293-0002</b>
<b>Registration #:</b>	<b>R097-25596-00635</b>

<b>Certification by the Authorized Individual</b>	
I hereby certify that M.L. Moody, Inc. dba Fiberglass Engineering and Design is :	<input type="checkbox"/> still in operation.
	<input type="checkbox"/> no longer in operation.
I hereby certify that M.L. Moody, Inc. dba Fiberglass Engineering and Design is :	<input type="checkbox"/> in compliance with the requirements of Registration 097-25596-00635.
	<input type="checkbox"/> not in compliance with the requirements of Registration 097-25596-00635.
<b>YEAR:</b> _____	
<b>Name (typed):</b>	
<b>Title:</b>	
<b>Signature:</b>	
<b>Phone Number:</b>	
<b>Date:</b>	

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

Technical Support Document (TSD) for a Registration

**Source Description and Location**

**Source Name:** M.L. Moody, Inc. dba Fiberglass Engineering and Design  
**Source Location:** 7421 Crawfordsville Rd., Indianapolis, IN 46214  
**County:** Marion  
**SIC Code:** 3089  
**Registration No.:** R097-25596-00635  
**Permit Reviewer:** AB/EVP

On November 28, 2007, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) received an application from M.L. Moody, Inc. dba Fiberglass Engineering and Design related to the operation of an existing unpermitted open mold fabrication process that manufactures mass transit cosmetic interior components.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective October 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM<sub>2.5</sub>.

\*These documents are incorporated by reference.

(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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Fugitive Emissions</b>
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The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

<b>Background and Description of Emission Units and Pollution Control Equipment</b>
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The Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) have reviewed an application, submitted by M.L. Moody, Inc. dba Fiberglass Engineering and Design, relating to the operation of an open mold fabrication process that manufactures mass transit cosmetic interior components.

The source consists of the following unpermitted emission unit:

- (a) One (1) open mold fabrication process, constructed in 1984. The mold fabrication area is ventilated by a dedicated exhaust fan equipped with particulate filters for capture of particulate matter. Mold fabrication activities include manual hand application of resins and manual cup gun application of gelcoats.

**Enforcement Issues**

IDEM and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM and OES are reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration**

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.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Open Mold Fabrication Process	2.12	2.12	0.00	0.00	2.29	0.00	2.29	2.29 (styrene)
Total PTE of Entire Source	2.12	2.12	0.00	0.00	2.29	0.00	2.29	2.29

negl. = negligible  
 \* 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.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a single HAP (styrene) is greater than or equal to 1 ton per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of 40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production) are not included in this permit for this source because this source is not a major source of HAPs.
- (c) The requirements of 40 CFR Part 63, Subpart U (National Emission Standards for Hazardous Air Pollutant Emission: Group I Polymers and Resins) are not included in this permit for this source

because this source is not a major source of HAPs.

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 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.
- (d) 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process)  
The open mold fabrication process is exempt from this rule, pursuant to 326 IAC 6-3-1(b)(14). The potential PM emission from the process is less than five hundred fifty-five thousandths (0.551) pounds per hour (See Appendix A: page 1 of 1).
- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The emission unit at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from the emission unit is less than twenty-five (25) tons per year.
- (i) 326 IAC 20-19 (Group I Polymers and Resins)  
This rule applies to sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs. The emission unit at this source is not subject to the requirements of 326 IAC 20-25, since the unlimited potential to emit of HAPs from the emission unit is less than twenty-five (25) tons per year.
- (j) 326 IAC 20-25 (Reinforced Plastics Composites Fabricating Emission Unit)  
This rule applies to sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs. The emission unit at this source is not subject to the requirements of 326 IAC 20-25, since the unlimited potential to emit of HAPs from the emission unit is less than twenty-five (25) tons per year.

### 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 November 28, 2007.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 097-25596-00635. The staff recommends to the Commissioner that this Registration be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to:  
  
Alic Bent  
c/o OES, Air Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221  
(317) 327-2221  
or dial directly: (317) 863-2514
- (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**  
**Form DD: Reinforced Plastics and Composites**  
**Open Molding Operations**  
**Resin and Gel Usage**

F

**Company Name: M.L. Moody, Inc. dba Fiberglass Engineering and Design**  
**Address City IN Zip: 7421 Crawfordsville Rd., Indianapolis, IN 46214**  
**Permit No.: R097-25596-00635**  
**Reviewer: AB/EVP**

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	
Open Mold Fabrication Process	Polyester Gelcoat	10.7	40.00%	0.21	1.000	439	11.72	2.14	75%	
	Polyester Resin	10.5	31.50%	0.08	1.000	79.38	0.83	0.15	75%	
<b>Total VOC/HAP and PM from Resin and Gel Use</b>								<b>2.29</b>		

**METHODOLOGY**

Emission factor (for Manual Resin Application) = (0.126 \* monomer content (%) \* 2000)

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

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

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

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

Potential PM (pounds/hour) = Potential PM (tons/year) \* (2000 lbs/ ton) \* (1 yr / 8760 hours)