



# 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: March 13, 2009

RE: Crane Composites, Inc. North Plant / 039-27419-00556

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, 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-MOD.dot 12/3/07



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Mr. Neuklis  
Crane Composites, Inc. (North Plant)  
2424 East Kercher Road  
Goshen, IN 46526

March 13, 2009

Re: 039-27419-00556  
Minor Source Modification to:  
Part 70 permit No.: T039-26758-00556

Dear Mr. Neuklis:

Crane Composites, Inc. (North Plant) was issued Part 70 Operating Permit Renewal T039-26758-00556 on March 12, 2009, for a stationary fiberglass and wood reinforced plastic flat panel manufacturing plant. An application to modify the source was received on January 29, 2009. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

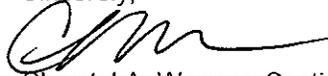
1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Michael Brooks or extension 4-3533, or dial (317) 234-3533.

Sincerely,



Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

MSB

cc: File - Elkhart County  
Elkhart County Health Department  
Northern Regional Office



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## Minor Source Modification to a Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Crane Composite, Inc. (North Plant)  
2424 East Kercher Road  
Elkhart, Indiana 46526**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 039-27419-00556

Issued by:

Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Issuance Date: **March 13, 2009**

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**Attachment A 40 CFR 63 Subpart WWWW**

## 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, A.3 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

---

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

|                              |  |
|------------------------------|--|
| Source Address:              | 2424 East Kercher Road, Elkhart, Indiana 46526   |
| Mailing Address:             | 2424 East Kercher Road, Elkhart, IN 46526  |
| General Source Phone Number: | (574) 534-0010   |
| SIC Code:                    | 3089   |
| County Location:             | Elkhart  |
| Source Location Status:      | Attainment for all criteria pollutants   |
| Source Status:               | Part 70 Operating Permit Program<br>Major Source, under PSD Rules<br>Major Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This company consists of two (2) plants:

- (a) Crane Composites, Inc. (South Plant), 3168 Maple City Drive, Goshen, Indiana
- (b) Crane Composites, Inc. (North Plant), 2424 East Kercher Road, Goshen, Indiana

Since the two (2) plants are owned by one (1) company (Crane Composites, Inc.), have the same SIC Code, 30 for Major Group 30: Rubber And Miscellaneous Plastics Products, and are located on adjacent properties, they will be considered one (1) source.

Separate Part 70 permits will be issued to Crane Composites, Inc. (South Plant), formerly 'Crane Composites Plant', and Crane Composites, Inc. (North Plant), formerly 'Noble Composites Plant', solely for administrative purposes.

These two plants have different plant identification numbers.

Crane Composites, Inc. (South Plant), ID - 039-00002  
Crane Composites, Inc. (North Plant), ID - 039-00556

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

---

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63,

Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.

- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control, and three (3) HVLPP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation.
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation.
- (e) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2.
- (f) One (1) sawing and grinding room (identified as EU10) equipped with two (2) panel saws (EU10A and EU10D), one (1) table saw (EU10B), and four (4) hand grinders (EU10C), approved for construction in 2007, controlled by a baghouse DC4 and exhausted at stack DC4.

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

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

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

- (a) One (1) mill room (identified as EU4), equipped with two (2) panel saws (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3-2]
- (b) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3. [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

## SECTION B GENERAL CONDITIONS

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

---

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

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

---

- (a) This permit, T039-26758-00556, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

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- (a) All terms and conditions of permits established prior to T039-26758-00556 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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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 2-7-3 and 326 IAC 2-7-4(a).

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

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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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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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 Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 10, 2004.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

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

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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

The statement must be submitted to:

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

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

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

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

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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) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS: Gel Coating and Laminating

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation.
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation.

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

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

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

Pursuant to Part 70 permit T039-16024-00556, issued on April 23, 2004 and Significant Permit Modification T039-19630-00556, issued on October 12, 2004, the fiberglass panel manufacturing operation (EU1 - EU3) is subject to the following.

- (a) The VOC/HAP emissions from the gel coat tunnels (EU1 and EU2) and the laminating tunnel (EU3) shall be controlled by a thermal oxidizer.
- (b) The use of resins and gel coats that contain styrene shall be limited such that the potential to emit VOC/HAP before control shall be less than 616 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The overall VOC/HAP control efficiency, including destruction efficiency and capture efficiency, for the thermal oxidizer shall be greater than 95%. Combined with the VOC/HAP emission limit of 616 tons/yr (before control), this is equivalent to 30.8 tons/yr of VOC/HAP emissions after control.
- (d) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specification

approved by IDEM, OAQ.

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

- (e) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ to be equivalent to the spray applicators listed above.
- (f) The listed work practices shall be followed:
  - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) For VOC- and/or HAP-containing materials:
    - (A) Cleanup solvent containers shall be used to transport solvent from drums to work.
    - (B) Cleanup stations shall be closed containers having soft-gasketed, springloaded closures and shall be kept completely closed when not in use.
    - (C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
    - (D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
    - (E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (3) All material storage containers shall be kept covered when not in use.

#### D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to Significant Permit Modification T039-24638-00556, issued on November 21, 2007, in order to render the requirements of 326 IAC 2-3 not applicable, the VOC emissions including VOC emissions from the gel coat tunnels (EU6 and EU7) and lamination tunnel (EU8) shall be limited as follows:

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

Compliance with these limits and the limits in Condition D.1.1 renders the requirements of 326

IAC 2-3, Emission Offset not applicable.

#### D.1.3 Operator Training [326 IAC 20-56-2]

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Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

- (a) All personnel hired shall be trained within thirty (30) days of hiring.
- (b) To ensure training goals are maintained, all personnel shall be given refresher training annually.
- (c) Personnel who have been trained by another owner or operator subject to this rule are exempt from (a) if written documentation that the employee's training is current is provided to the new employer.
- (d) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

#### D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]

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Pursuant to 326 IAC 6-3-2(d), particulate from the gel coat tunnels (EU1, EU2, EU6, and EU7) and the laminating tunnels (EU3 and EU8) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.1.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

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

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

- (d) An alternate method approved by IDEM, OAQ.
- (e) IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.7 Volatile Organic Compounds (VOC)

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Compliance with the Conditions D.1.2(b) shall be determined using the following calculation and criteria:

(a) 
$$\text{VOC emissions (tons/month)} = \sum ((A_i * B_i) / 2000) * (\text{UEF}_i / 2000) * (1-C)$$

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

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

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

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

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

i = type of resin or gel

2000 = conversion factor (lbs/ton)

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

#### D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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The Permittee shall conduct a performance test to verify VOC/HAP control efficiency as per conditions D.1.1 (c) and D.1.2 (a) for the thermal oxidizers using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

##### D.1.9 Thermal Oxidizer Temperature [40 CFR 64.2, Compliance Assurance Monitoring (CAM)]

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous means no less than one minute. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1,500°F.

- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1 and D.1.2 as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

These monitoring conditions satisfy 40 CFR 64.2, Compliance Assurance Monitoring (CAM).

#### D.1.10 Parametric Monitoring [40 CFR 64]

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- (a) The Permittee shall determine the appropriate duct pressure, or fan amperage, or blower frequency range from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1 and D.1.2 as approved by IDEM.
  - (b) The duct pressure, or fan amperage, or blower frequency range shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
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#### D.1.11 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks TO-1 and TO-2 while the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### D.1.12 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC and HAP emission limits before control. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and VOC/HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;

- (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain the following training records:
  - (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain the continuous temperature records for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain the daily records of the duct pressure, or fan amperage, or blower frequency range. The Permittee shall include in its daily record when the duct pressure, or fan amperage, or blower frequency range reading is not taken and the reason for the lack of a duct pressure, or fan amperage, or blower frequency reading (e.g. the process did not operate that day).
- (e) To document compliance with Conditions D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

A monthly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.2 FACILITY OPERATION CONDITIONS: Sawing, Grinding, and Milling**

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

(e) One (1) saw and grinding room (identified as EU5) equipped with two (2) panel saws, one (1) table saw, and four (4) hand grinders, controlled by baghouse DC2 and exhausting at stack DC2. [326 IAC 6-3]

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

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

(a) One (1) mill room (identified as EU4), equipped with two (2) panel saw (EU4A and EU4C) and one (1) panel sander (EU4B) controlled by baghouse DC1 and exhausting at stack DC1. [326 IAC 6-3]

(b) One (1) mill room (identified as EU9) equipped with two (2) panel saws (EU9A and EU9B), and one (1) panel sander (EU9C), approved for construction in 2007, controlled by a baghouse (DC3) and exhausted to stack DC3. [326 IAC 6-3]

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

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

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

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

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

The pound per hour limitation was calculated as follows:

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

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

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

Pursuant to Minor Source Modification 039-21924-00556, issued on December 22, 2005, and 326 IAC 2-7-10.5(d)(4)(C) the baghouse (identified as DC2) to be used in conjunction with the

grinding and machining operations (consisting of one (1) saw and grinding room, identified as (EU5) shall comply with the following limits when the grinding and machining operations are in operation:

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

Compliance with these limits in conjunction with the uncontrolled PTE of PM/PM10 from the mill room, identified as EU4, shall ensure emissions of PM/PM10 to less than 25 tons per year for this modification.

### **Compliance Determination Requirements**

#### **D.2.3 Particulate Control**

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- (a) In order to comply with condition D.2.1 controls shall be operated at all times that the emission units vented to the control equipment are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

---

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

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

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

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

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

of the operation that would normally be expected to cause the greatest emissions.

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

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

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

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

##### D.2.7 Record Keeping Requirements

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

## SECTION E.1 SOURCE OPERATION CONDITIONS: NESHAP [40 CFR Part 63, Subpart WWWW]

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

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

#### E.1.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

#### E.1.2 Reinforced Plastics Composites Production NESHAP [40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A of this permit).

- (1) 63.5780
- (2) 63.5785(a)
- (3) 63.5790(a),(b),(c)
- (4) 63.5795

- (5) 63.5796
- (6) 63.5797
- (7) 63.5798
- (8) 63.5799(b),(c)
- (9) 63.5800
- (10) 63.5805(a),(b),(h)
- (11) 63.5810
- (12) 63.5835
- (13) 63.5840
- (14) 63.5845
- (15) 63.5850
- (16) 63.5855
- (17) 63.5860
- (18) 63.5895
- (19) 63.5900
- (20) 63.5905
- (21) 63.5910
- (22) 63.5915
- (23) 63.5920
- (24) 63.5925
- (25) 63.5930
- (26) 63.5935

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

Source Name: Crane Composite, Inc. (North Plant)  
Source Address: 2424 East Kercher Road, Elkhart, Indiana 46526  
Mailing Address: 2424 East Kercher Road, Elkhart, IN 46526  
Part 70 Permit No.: T039-26758-00556

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Crane Composite, Inc. (North Plant)  
Source Address: 2424 East Kercher Road, Elkhart, Indiana 46526  
Mailing Address: 2424 East Kercher Road, Elkhart, IN 46526  
Part 70 Permit No.: T039-26758-00556

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Crane Composites, Inc. (North Plant)  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Part 70 Permit No.: T039-26758-00556  
Facility: Fiberglass panel manufacturing unit (EU1, EU2, and EU3)  
Parameter: VOC/HAP Emissions before control  
Limit: 616 tons per twelve (12) consecutive month period with compliance determined at the end of each month  
YEAR:

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

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

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

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report

Source Name: Crane Composites, Inc. (North Plant)  
Source Address: 2424 East Kercher Road, Goshen, Indiana 46526  
Part 70 Permit No.: T039-26758-00556  
Facility: Fiberglass panel manufacturing unit (EU6, EU7, and EU8)  
Parameter: VOC Emissions after controls  
Limit: Fifty-four (54) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Crane Composite, Inc. (North Plant)  
 Source Address: 2424 East Kercher Road, Elkhart, Indiana 46526  
 Mailing Address: 2424 East Kercher Road, Elkhart, IN 46526  
 Part 70 Permit No.: T039-26758-00556

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Part 70 Minor Source  
Modification**

**Source Description and Location**

|                                 |  |
|---------------------------------|--|
| Source Name:                    | Crane Composites, Inc. (North Plant)     |
| Source Location:                | 2424 East Kercher Road, Goshen, IN 46526 |
| County:                         | Elkhart                                  |
| SIC Code:                       | 3089                                     |
| Operation Permit No.:           | T039-26758-00556                         |
| Operation Permit Issuance Date: | March 12, 2009                           |
| Minor Source Modification No.:  | 039-27419-00556                          |
| Minor Permit Modification No.:  | 039-27453-00556                          |
| Permit Reviewer:                | Michael S. Brooks                        |

**Source Definition**

Pursuant to Administrative Amendment 039-25385-00002, issued on January 22, 2008, the source is defined as follows:

This company consists of two (2) plants:

- (a) Crane Composites, Inc. (South Plant), 3168 Maple City Drive, Goshen, Indiana
- (b) Crane Composites, Inc. (North Plant), 2424 East Kercher Road, Goshen, Indiana

Since the two (2) plants are owned by one (1) company (Crane Composites, Inc.), have the same SIC Code, 30 for Major Group 30: Rubber And Miscellaneous Plastics Products, and are located on adjacent properties, they will be considered one (1) source.

Separate Part 70 permits will be issued to Crane Composites, Inc. (South Plant), formerly 'Crane Composites Plant', and Crane Composites, Inc. (North Plant), formerly 'Noble Composites Plant', solely for administrative purposes.

These two plants have different plant identification numbers.

Crane Composites, Inc. (South Plant), ID - 039-00002  
Crane Composites, Inc. (North Plant), ID - 039-00556

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T039-26758-00556 on March 12, 2009.

There have been no other approvals issued to this source since that time.

|                                 |
|---------------------------------|
| <b>County Attainment Status</b> |
|---------------------------------|

The source is located in Elkhart County.

| Pollutant  | Designation   |
|--|---|
| SO <sub>2</sub>  | Better than national standards.   |
| CO   | Unclassifiable or attainment effective November 15, 1990.                       |
| O <sub>3</sub>   | Attainment effective July 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   | Not designated.   |
| <sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.<br>Unclassifiable or attainment effective April 5, 2005, for PM2.5. |   |

(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, and St. Joseph Counties 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, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties 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. Elkhart 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) Elkhart County has been classified as attainment for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules is July 15, 2008. Indiana has three (3) years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008, rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants  
 Elkhart County has been classified as attainment or unclassifiable in Indiana for PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories

under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

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

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

| Process/<br>Emission Unit                 | Potential to Emit (tons/year) |                  |                 |                |            |                 |                  |
|---|-------------------------------|------------------|-----------------|----------------|------------|-----------------|------------------|
|   | PM                            | PM <sub>10</sub> | SO <sub>2</sub> | VOC            | CO         | NO <sub>x</sub> | HAPs             |
| <b>Gel Coat &amp; Lamination</b>          | 12.67                         | 12.67            |                 | 63.78          |            |                 | >10/25           |
| <b>Saw &amp; Grinding</b>                 | 0.6                           | 0.6              |                 |                |            |                 |                  |
| <b>Mill Room</b>                          | 0.32                          | 0.32             |                 |                |            |                 |                  |
| <b>RTOs</b>                               | 0.52                          | 0.52             | 0.05            | 0.38           | 5.8        | 4.05            | <10/25           |
| <b>North Plant Total</b>                  | <b>14.11</b>                  | <b>14.11</b>     | <b>0.05</b>     | <b>64.16</b>   | <b>5.8</b> | <b>4.05</b>     | <b>&gt;10/25</b> |
| <b>South Plant Total</b>                  | <b>480</b>                    | <b>480</b>       |                 | <b>376</b>     |            |                 | <b>&gt;10/25</b> |
| <b>Source Total</b>                       | <b>&gt;250</b>                | <b>&gt;250</b>   | <b>0.05</b>     | <b>&gt;250</b> | <b>5.8</b> | <b>4.05</b>     | <b>&gt;10/25</b> |
| <b>Minor Source Threshold for Part 70</b> | —                             | <b>100</b>       | <b>100</b>      | <b>100</b>     | <b>100</b> | <b>100</b>      | <b>10/25</b>     |
| <b>Major PSD Threshold</b>                | <b>250</b>                    | <b>250</b>       | <b>250</b>      | <b>250</b>     | <b>250</b> | <b>250</b>      | <b>NA</b>        |

- (a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, and is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.
- (c) These emissions are based upon Part 70 Operating Permit No. T039-26758-00556.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

### Actual Emissions

The following table shows the actual emissions as reported from the source. This information reflects the 2006 OAQ emission data.

| Pollutant        | Actual Emissions<br>(tons/year) |
|------------------|---------------------------------|
| PM <sub>10</sub> | 1                               |
| SO <sub>2</sub>  | 0                               |
| VOC              | 13                              |
| CO               | 1                               |
| NO <sub>x</sub>  | 1                               |
| HAP              | No Data                         |

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Crane Composites, Inc. (North Plant) on January 29, 2009, relating to the installation of one (1) additional polyester resin application reciprocator in its lamination booth (EU3). The following is the modified emission unit:

- (a) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.

### Enforcement Issues

There are no pending enforcement actions.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### Permit Level Determination – Part 70

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

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

| <b>PTE Before Controls of the Modification</b> |                                   |
|--|-----------------------------------|
| <b>Pollutant</b>                               | <b>Potential To Emit (ton/yr)</b> |
| PM   | 0                                 |
| PM <sub>10</sub>                               | 0                                 |
| SO <sub>2</sub>                                | 0                                 |
| VOC  | 39                                |
| CO   | 0                                 |
| NO <sub>x</sub>                                | 0                                 |

| <b>HAP PTE Before Controls of the Modification</b> |                                   |
|--|-----------------------------------|
| <b>HAPs</b>  | <b>Potential To Emit (ton/yr)</b> |
| Styrene  | 38                                |
| TOTAL  | 38                                |

Pursuant to 326 IAC 2-7-10.5(d)(8) this source modification is minor modification because it is a modification that has a potential to emit greater than the thresholds under subdivision (3) that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3. Specifically this modification will be adding an additional applicator, which has the potential to emit greater than the thresholds under subdivision (3), to an already permitted lamination booth.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1)(H), because it is not required by the Part 70 program to be processed as a significant modification.

**Permit Level Determination – PSD**

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

| <b>Process / Emission Unit</b>                        | <b>Potential to Emit (ton/yr)</b> |                        |                       |            |           |                       |
|---|-----------------------------------|------------------------|-----------------------|------------|-----------|-----------------------|
|   | <b>PM</b>                         | <b>PM<sub>10</sub></b> | <b>SO<sub>2</sub></b> | <b>VOC</b> | <b>CO</b> | <b>NO<sub>x</sub></b> |
| one (1) HVLP polyester resin application reciprocator | 0                                 | 0                      | 0                     | 39         | 0         | 0                     |
| Total for Modification                                | 0                                 | 0                      | 0                     | 39         | 0         | 0                     |
| Significant Level                                     | 25                                | 15                     | 40                    | 40         | 100       | 40                    |

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

**NSPS:**

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

**NESHAP:**

- (b) There are no additional National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable as a result of this proposed modification.
- (c) The laminating tunnel, identified as EU3 is subject to National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56. The HVLP polyester resin application reciprocator will be part of EU3.

**CAM:**

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) have a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
  - (2) are subject to an emission limitation or standard for that pollutant; and
  - (3) use a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new unit as part of this modification.

|   |
|---|
| <b>State Rule Applicability Determination</b> |
|---|

The following state rules are applicable to the source due to the modification:

**326 IAC 2-2 (PSD)**

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of the HVLP polyester resin application reciprocator will emit greater than ten (10) tons per year for a single HAP. Therefore, 326 IAC 2-4.1 would apply to the HVLP polyester resin application reciprocator, however, pursuant to 326 IAC 2-4.1-1(b)(2), because this HVLP polyester resin application reciprocator is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, this HVLP polyester resin application reciprocator is exempt from the requirements of 326 IAC 2-4.1.

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

The laminating tunnel identified as EU3 is already subject to 326 IAC 6-3-2. This modification is not subject to additional requirements under 326 IAC 6-3-2.

**326 IAC 20-56-2 (Operator Training)**

The source is already subject to 326 IAC 20-56-2.

**326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

The addition of the one (1) HVLP polyester resin application reciprocator does not require a re-opening of the 326 IAC 8-1-6 BACT analysis. The source is still able to comply with the Best Available Control Technology (BACT) requirements.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no changes to the Compliance Determination and Monitoring Requirements resulting from this modification.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T039-26758-00556. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

#### Change #1

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

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

- ...
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control **and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009**, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.
- ...

#### Change #2

##### SECTION D.1 FACILITY OPERATION CONDITIONS: Gel Coating and Laminating

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control **and three (3) HVLP polyester resin application**

**reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009**, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation.

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

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

Change #3

#### **SECTION E.1 SOURCE OPERATION CONDITIONS: NESHAP [40 CFR Part 63, Subpart WWWW]**

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

- (a) Two (2) gel coat tunnels, identified as EU1 and EU2, constructed in 2001 and modified in 2004, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (b) One (1) laminating tunnel, identified as EU3, constructed in 2001 and modified in 2004, equipped with dry filters for particulate control **and three (3) HVLP polyester resin application reciprocators, identified as EU3-1, EU3-2, and EU3-3. EU3-1 and EU3-2 were constructed in 2001 and EU3-3 is approved for construction in 2009**, using a natural gas-fired thermal oxidizer (identified as VECD1, with a maximum heat input capacity of 2.75 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-1. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW]
- (c) Two (2) gel coat tunnels, identified as EU6 and EU7, approved for construction in 2007, both equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]
- (d) One (1) laminating tunnel, identified as EU8, approved for construction in 2007, equipped with dry filters for particulate control, using a natural gas-fired thermal oxidizer, equipped with low NOX burners (identified as VECD2, with a maximum heat input capacity of 13.0 MMBtu/hr) for VOC/HAP control, and exhausting to stack TO-2. Under 40 CFR 63, Subpart WWWW, this is considered an open molding reinforced plastic composites operation. [40 CFR 63, Subpart WWWW] [326 IAC 20-56]

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

**Conclusion and Recommendation**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-27419-00556 and Minor Permit Modification No. 039-27453-00556. The staff recommends to the Commissioner that this Part 70 Minor Source and Minor Permit Modification be approved.

**Appendix A: Emission Calculations**  
**Reinforced Plastics and Composites Open Molding Operations**  
**VOC and PM/PM10/PM2.5 Emissions**  
**From Fiberglass Panel Manufacturing Processes EU3**

**Company Name: Crane Composites, Inc. (North Plant)**  
**Address: 2424 East Kercher Rd., Goshen, IN 46526**  
**Permit Modification Number: 039-27453-00556**  
**Source Modification Number: 039-27419-00556**  
**Reviewer: Michael S. Brooks**  
**Date: February 9, 2009**

These units are controlled by a thermal oxidizer and dry filters.

| Unit         | Application Method  | Material | Density (lbs/gal) | Weight % VOC | Max. Production Rate (unit/hr) | Max. Coating Usage (gal/unit) | Maximum Usage (lbs/hr) | *VOC Emission Factor (lbs/ton) | PTE of VOC (lbs/hr) | PTE of VOC (lbs/day) | PTE of VOC before Control (tons/yr) | VOC Control Efficiency (%) | PTE of VOC after Control (tons/yr) | **PTE of PM/PM10/PM2.5 before Control (lbs/hr) | **PTE of PM/PM10/PM2.5 before Control (tons/yr) | ***Transfer Efficiency | ****PM/PM10/PM2.5 Control Efficiency | PTE of PM/PM10/PM2.5 after Control (lbs/hr) | PTE of PM/PM10/PM2.5 after Control (tons/yr) |
|--------------|---|----------|-------------------|--------------|--------------------------------|-------------------------------|------------------------|--------------------------------|---------------------|----------------------|-------------------------------------|----------------------------|------------------------------------|--|---|------------------------|--------------------------------------|---|--|
| EU3          | Mechanical Atomized Application with Controlled Spray (covered-cure after roll-out) | Resin    | 10.84             | 35.0%        | 10.0                           | 11.8                          | 1,279                  | 64.5                           | 41.3                | 990                  | 181                                 | 95%                        | 9.0                                | 8.31   | 36.4  | 99%                    | 76%                                  | 2.00  | 8.74   |
| EU3          | Mechanical Atomized HVLP polyester resin application reciprocator                   | Resin    | 9.42              | 31.0%        | 10.0                           | 3.0                           | 278                    | 64.5                           | 9.0                 | 215                  | 39.24                               | 95%                        | 2.0                                | 0.00   | 0.0   | 100%                   | 76%                                  | 0.00  | 0.00   |
| <b>Total</b> |   |          |                   |              |                                |                               |                        |                                |                     |                      | <b>220</b>                          |                            | <b>11.0</b>                        |  | <b>36.4</b>                                     |                        |                                      |   | <b>8.7</b>                                   |

Emission factors are based on Unified Emission Factor (UEF) of Styrene and a-Methyl Styrene; Mechanical Atomized, Controlled Spray, Covered Cure Post Rollout (0.13 x %HAP x 2,000) x 0.8 (Covered Cure Factor)

\*\* Assume all the PM emissions equal PM10 and PM2.5 emissions.

\*\*\* The transfer efficiency and control efficiency are from the "Draft Guide to the Estimation and Permitting of PM from the Manufacture of Reinforced Plastic Composites" by CFA in August, 2001.

\*\*\*\* The PM control efficiency includes 80% capture efficiency and 95% control efficiency for dry filters.

#### METHODOLOGY

Max. Usage (lbs/hr) = Max. Production Rate (unit/hr) x Max. Coating Usage (gal/unit) x Density (lbs/gal)

PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

PTE of VOC (lbs/day) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 24 hr/day

PTE of VOC before Control (tons/yr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

PTE of VOC after Control (tons/yr) = PTE of VOC (tons/yr) x (1-VOC Control Efficiency)

PTE of PM/PM10/PM2.5 before Control (lbs/hr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency)

PTE of PM/PM10/PM2.5 before Control (tons/yr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM10/PM2.5 after Control (lbs/hr) = PTE of PM/PM10/PM2.5 before Control (lbs/hr) x (1 - Control Efficiency)

PTE of PM/PM10/PM2.5 after Control (tons/yr) = PTE of PM/PM10/PM2.5 before Control (lbs/hr) x (1 - Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**Reinforced Plastics and Composites Open Molding Operations**  
**HAPs Emissions**  
**From Fiberglass Panel Manufacturing Processes EU3**

**Company Name: Crane Composites, Inc. (North Plant)**  
**Address: 2424 East Kercher Rd., Goshen, IN 46526**  
**Permit Modification Number: 039-27453-00556**  
**Source Modification Number: 039-27419-00556**  
**Reviewer: Michael S. Brooks**  
**Date: February 9, 2009**

| Unit                                       | Application Method  | Material | Density (lbs/hr) | Max. Production Rate (unit/hr) | Max. Coating Usage (gal/unit) | Maximum Usage (lbs/hr) | Weight % Styrene | *Emission Factor for Styrene (lbs/ton) | PTE of Styrene (tons/yr) | Weight % MMA | *Emission Factor for MMA (lbs/ton) | PTE of MMA (tons/yr) | Total HAPs (tons/yr) |
|--|---|----------|------------------|--------------------------------|-------------------------------|------------------------|------------------|--|--------------------------|--------------|------------------------------------|----------------------|----------------------|
| EU3  | Mechanical Atomized Application with Controlled Spray (covered-cure after roll-out) | Resin    | 10.84            | 10.0                           | 11.8                          | 1,279                  | 35.0%            | 62.4                                   | 175                      | 0.0%         | 0                                  | 0.00                 | 175                  |
| EU3  | Mechanical Atomized HVLP polyester resin application reciprocator                   | Resin    | 9.42             | 10.0                           | 3.0                           | 278                    | 30.0%            | 62.4                                   | 38                       | 0.0%         | 0                                  | 0.00                 |                      |
| <b>Total PTE before Control (tons/yr)</b>  |   |          |                  |                                |                               |                        |                  |  | <b>213</b>               |              |                                    | <b>0.0</b>           | <b>213</b>           |
| <b>**Total PTE after Control (tons/yr)</b> |   |          |                  |                                |                               |                        |                  |  | <b>10.6</b>              |              |                                    | <b>0.00</b>          | <b>10.6</b>          |

Emission factors are based on Unified Emission Factor (UEF) of Styrene and a-Methyl Styrene; Mechanical Atomized, Controlled Spray, Covered Cure Post Rollout (0.13 x %HAP x 2,000) x 0.8 (Covered Cure Factor)

\*\* HAP emissions from these units will be controlled by a thermal oxidizer with an overall control efficiency of 95%.

#### METHODOLOGY

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

Total PTE after Control (tons/yr) = Total PTE before Control (tons/yr) x (1-95%)