



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

TO: Interested Parties / Applicant

DATE: February 24, 2010

RE: Better Way Partners LLC dba Better Way Products / 085-28722-00114

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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February 24, 2010

Mr. Clint Decker
Better Way Partners, LLC, dba Better Way Products
70891 CR 23
New Paris, Indiana 46553

Re: 085-28722-00114
Significant Source Modification to
Part 70 No.: T085-26101-00114

Mr. Decker:

Better Way Partners, LLC, dba Better Way Products, was issued a Part 70 Operating Permit on June 18, 2008, for a stationary reinforced plastic composites manufacturing facility. A letter requesting changes to this permit was received on December 7, 2009. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
- (b) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
- (c) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

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.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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, please contact Stephanie Wilkerson, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Stephanie Wilkerson or extension 4-5329 or dial (317) 234-5329.

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit
Technical Support Document
PTE Calculations

sjw

cc: File – Kosciusko County
Kosciusko County Health Department
U.S. EPA, Region V
IDEM Northern Regional Office
Compliance and Enforcement Branch



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Significant Source Modification to a Part 70 Source OFFICE OF AIR QUALITY

Better Way Partners, LLC, dba Better Way Products
501 West Railroad Avenue
Syracuse, Indiana 46567

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

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No. 085-28722-00114	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 24, 2010

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Pollutants for Reinforced Plastics Composites Production**

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, and 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 reinforced plastic composites manufacturing facility.

Source Address:	501 West Railroad Avenue, Syracuse, Indiana 46567
Mailing Address:	70891 County Road 23, New Paris, Indiana, 46553
General Source Phone Number:	574-831-3340
SIC Code:	3088
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

The Better Way Partners, LLC, dba Better Way Products plant (Better Way), source number 085-00114, will be located in the same building as the Castle BWP, LLC, plant (Castle), source number 085-00111 and the J. P., Inc., dba Jasper Plastic Solutions plant (Jasper), source number 085-00013. IDEM, OAQ examined whether these plants should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) The plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for one or both of the others; and,
- (3) the plants must be located on contiguous or adjacent properties.

The Better Way and Castle plants are under common ownership and common control. The responsible official is the same for both plants. Some of the production managers for Better Way may also manage production at Castle. However, the Jasper plant is owned and controlled by a separate corporation unrelated to Better Way and Castle.

All three plants have the same two-digit SIC code, 30, for Rubber and Miscellaneous Plastic Products.

All three plants will be located on the same property. IDEM, OAQ finds that the Better Way plant and the Castle plant are one major source and will be issued one (1) Part 70 operating permit. IDEM, OAQ further finds that the Jasper plant is not part of the Better Way and Castle major source and Jasper will be issued a separate Part 70 operating permit.

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) One (1) polymer cast molding process, consisting of the following emission units:
 - (1) Three (3) covered mixing vats, approved for construction in 2008, identified as PCMV1 through PCMV3, with a total maximum capacity of 105.32 pounds of resin per hour. Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source; and
 - (2) One (1) polymer cast molding unit, approved for construction in 2008, identified as PCM1, with a maximum capacity of 1.67 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

- (b) One (1) lite granite countertop open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM1, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (2) One (1) countertop open molding booth, approved for construction in 2008, identified as LG1, using mechanical non-atomized application of resin at a maximum production rate of twenty (20) units per hour, controlled by dry particulate filters, and exhausted through stack S1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

- (c) One (1) bathtub and shower open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM2, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit in a new affected source;
 - (2) One (1) bathtub and shower gel coat application booth, approved for construction in 2008, identified as BTSG1, using high-volume low-pressure (HVLP) spray application, with a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S2. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (3) One (1) bathtub and shower lamination (chop) booth, approved for construction in 2008, identified as BTSL1, using mechanical non-atomized application of resin at a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S3. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (4) One (1) bathtub and shower final finish open molding parts repair operation, approved for construction in 2008, identified as BTSFF1, using high-volume low-pressure (HVLP) spray application of gel coats and hand application of resins at a maximum capacity of 12.5 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

- (d) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
- (e) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
- (f) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

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

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

- (a) Ten (10) hand grinders, approved for construction in 2008, identified as HGR1 through HGR10, with a total maximum production rate of 136.78 pounds per hour, controlled by two (2) dust collectors identified as DC1 and DC2;
- (b) One (1) table saw, approved for construction in 2008, identified as TS1, with a maximum capacity of 32 pounds per hour, controlled by one (1) dust collector identified as DC3;
- (c) One (1) bulk resin tank, approved for construction in 2008, identified as BT1, with a maximum capacity of 5,000 gallons, and exhausting to stack BTV1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
- (d) Five (5) hand grinders, approved for construction in 2008, identified as HGR11 through HGR15, with a total maximum production rate of 618.33 pounds per hour, controlled by one (1) dust collector identified as DC4;
- (e) Ten (10) hand grinders, approved for construction in 2008, identified as HGR16 through HGR25, with a total maximum capacity of 1,390.79 pounds per hour, controlled by one (1) dust collector identified as DC5.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

B.4 Permit Term [326 IAC 2-7-5(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, T085-26101-00114, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability [326 IAC 2-7-7]

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

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

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

B.10 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.11 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 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.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.13 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement
Branch)
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.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T085-26101-00114 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30)

days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.19 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
Permit 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.20 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
Permit 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.21 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

B.22 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

Indiana Department of Environmental Management
Permit 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.23 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.24 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.25 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
Permit 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.26 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.27 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]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere

in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance 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]

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

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

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

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

Indiana Department of Environmental Management
Compliance 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]

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

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

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

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (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]

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]

- (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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) polymer cast molding process, consisting of the following emission units:
 - (1) Three (3) covered mixing vats, approved for construction in 2008, identified as PCMV1 through PCMV3, with a total maximum capacity of 105.32 pounds of resin per hour. Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source; and
 - (2) One (1) polymer cast molding unit, approved for construction in 2008, identified as PCM1, with a maximum capacity of 1.67 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (b) One (1) lite granite countertop open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM1, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (2) One (1) countertop open molding booth, approved for construction in 2008, identified as LG1, using mechanical non-atomized application of resin at a maximum production rate of twenty (20) units per hour, controlled by dry particulate filters, and exhausted through stack S1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (c) One (1) bathtub and shower open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM2, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (2) One (1) bathtub and shower gel coat application booth, approved for construction in 2008, identified as BTSG1, using high-volume low-pressure (HVLP) spray application, with a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S2. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (3) One (1) bathtub and shower lamination (chop) booth, approved for construction in 2008, identified as BTSL1, using mechanical non-atomized application of resin at a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S3. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (4) One (1) bathtub and shower final finish open molding parts repair operation,

approved for construction in 2008, identified as BTSFF1, using high-volume low-pressure (HVLP) spray application of gel coats and hand application of resins at a maximum capacity of 12.5 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

- (d) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
- (e) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
- (f) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) The usage of gel coats, resins, catalysts, and solvents at the reinforced plastic composites manufacturing operations, including the three (3) mixing vats identified as PCMV1 through PCMV3, the one (1) polymer cast molding unit identified as PCM1, the two (2) shear mixing tanks identified as SM1 and SM2, the one (1) open molding booth identified as LG1, the one gel coat application booth identified as BTSG1, the one (1) lamination (chop) booth identified as BTGL1, the one (1) final finish repair unit identified as BTSFF1, the one (1) reciprocator identified as RGR1, the two (2) reciprocators identified as RR1 and RR2, the one (1) portable FIT gel coat application gun identified as PGG1, and the associated clean-up solvents for these facilities, shall be limited such that the total VOC emissions from these units is less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The sourcewide PM/PM₁₀ emissions shall be limited to less than 250 tons per twelve (12) consecutive month period:
 - (1) The gel coats and resins applied by the open molding booth identified as LG1, the gel coat application booth identified as BTSG1, the lamination (chop) booth identified as BTSL1, the final finish repair operations, identified as BTSFF1, and the one (1) portable FIT gel coat application gun identified as PGG1 shall be limited such that the total PM/PM₁₀ emissions shall not exceed 243 tons per year.
 - (A) The transfer efficiency of the gel coat application shall not be less than 75%.
 - (B) The transfer efficiency of the resin application shall not be less than 95%.
 - (2) The three (3) mixing vats, identified as PCMV1 through PCMV3, and the two (2) shear mixing tanks, identified as SM1 and SM2, shall operate with their covers on,

unless loading or unloading of the tanks is occurring, at all times that the tanks are in use to limit the amount of particulate emissions from the mixing operations.

Compliance with these limits will limit the source to less than 250 tons per year of VOC and PM/PM₁₀ emissions, including the potential to emit from all insignificant activities. This will render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate Matter Emissions [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from the three (3) reinforced plastic composites production booths, identified as LG1, BTSG1, and BTSL1, and the one (1) portable FIT gel coat application gun identified as PGG1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter emissions from the three (3) mixing vats, identified as PCMV1 through PCMV3, shall not exceed 0.57 pounds per hour when operating at a process weight rate of 0.05 tons per hour. The pound per hour limitation was calculated with the following equation:
- (1) Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$
- (c) Pursuant to 326 IAC 6-3-2, the particulate matter emissions from the one (1) shear mixing tank, identified as SM1, shall not exceed 1.59 pounds per hour when operating at a process weight rate of 0.24 tons per hour. The pound per hour limitation was calculated with the following equation:
- (1) Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$
- (d) Pursuant to 326 IAC 6-3-2, the particulate matter emissions from the one (1) shear mixing tank, identified as SM2, shall not exceed 2.72 pounds per hour when operating at a process weight rate of 0.54 tons per hour. The pound per hour limitation was calculated with the following equation:
- (1) Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

D.1.3 Reinforced Plastic Composites Manufacturing [326 IAC 20-56-2]

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
- (1) All personnel hired shall be trained within (30) days of hiring.

- (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employees.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of the most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

VOC emissions from gel coats and resins shall be calculated by multiplying the usage of each gel coat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, or its updates in conjunction with the following equation:

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

Where:

E = VOC emissions (tons/month)

n = number of resins and gel coats used during the day

A_i = density (lb/gal resin or gel)

B_i = gallons of resin or gel used per month

UEF_i = 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)

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 emissions calculations, monomer in resins and gel coats that is not styrene shall be considered styrene on an equivalent weight basis.

D.1.6 Particulate Control

In order to comply with Condition D.1.2(b), (c), and (d), the covers for the three (3) mixing vats, identified as PCMV1 through PCMV3, and for the two (2) shear mixing tanks, identified as SM1 and SM2, shall operate with their covers on, unless loading or unloading of the tanks is occurring, at all times that the tanks are in use to limit the amount of particulate emissions from the mixing operations.

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

D.1.7 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the dry particulate filters, weekly observations shall be made of the overspray from the stacks for the three (3) reinforced plastics composites manufacturing booths (open molding booth stack S1, gel coat application booth stack S2, and lamination (chop) booth stack S3), and the one (1) portable FIT gel coat application gun identified as PGG1 while the units 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 particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These compliance monitoring conditions are necessary because the dry particulate filters for the three (3) booths and the one (1) portable FIT gel coat application gun must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70).

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

D.1.8 Record Keeping Requirement

- (a) To document compliance with D.1.1, the Permittee shall maintain the following records in accordance with (1) through (9) below. Records maintained for (1) through (9) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

Coating Material and Solvent Use other than monomer-based gel coats and resins

- (1) The amount and VOC content by weight of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOC emitted for each compliance period.

Monomer-based gel coats and resins

- (6) The amount 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 HAP content of each resin or gel coat;
 - (7) A log of the dates of use;
 - (8) Method of application and other emission reduction techniques for each resin and gel coat used; and
 - (9) Monthly calculations demonstrating the weight of the VOC emitted for each compliance period.
- (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; and
 - (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.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period 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 E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) polymer cast molding process, consisting of the following emission units:
 - (1) Three (3) covered mixing vats, approved for construction in 2008, identified as PCMV1 through PCMV3, with a total maximum capacity of 105.32 pounds of resin per hour. Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source; and
 - (2) One (1) polymer cast molding unit, approved for construction in 2008, identified as PCM1, with a maximum capacity of 1.67 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (b) One (1) lite granite countertop open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM1, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (2) One (1) countertop open molding booth, approved for construction in 2008, identified as LG1, using mechanical non-atomized application of resin at a maximum production rate of twenty (20) units per hour, controlled by dry particulate filters, and exhausted through stack S1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (c) One (1) bathtub and shower open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM2, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (2) One (1) bathtub and shower gel coat application booth, approved for construction in 2008, identified as BTSG1, using high-volume low-pressure (HVLP) spray application, with a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S2. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (3) One (1) bathtub and shower lamination (chop) booth, approved for construction in 2008, identified as BTSL1, using mechanical non-atomized application of resin at a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S3. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (4) One (1) bathtub and shower final finish open molding parts repair operation,

approved for construction in 2008, identified as BTSFF1, using high-volume low-pressure (HVLP) spray application of gel coats and hand application of resins at a maximum capacity of 12.5 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

- (d) One (1) bulk resin tank, approved for construction in 2008, identified as BT1, with a maximum capacity of 5,000 gallons, and exhausting to stack BTV1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
- (e) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
- (f) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
- (g) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

(The information describing the process contained in this emissions unit 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 the schedule in 40 CFR 63, Subpart WWWW.

E.1.2 Reinforced Plastics Composites Production NESHAP [326 IAC 20-56] [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 which is incorporated by reference as 326 IAC 20-56, as follows. The full text of Subpart WWWW may be found in Attachment A to this permit.

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799 introduction and (a)
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805
- (11) 40 CFR 63.5810
- (12) 40 CFR 63.5835(a) and (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860(a)
- (15) 40 CFR 63.5895(b)(1), (b)(2), (b)(3), (b)(4), (c), and (d)

- (16) 40 CFR 63.5900(a)(2), (a)(4), (b), (c), and (e)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910
- (19) 40 CFR 63.5915(a)(1), (a)(2), (a)(3), (c), and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935
- (24) Table 1 to 40 CFR 63, Subpart WWWW (applicable portions)
- (25) Table 2 to 40 CFR 63, Subpart WWWW (applicable portions)
- (26) Table 3 to 40 CFR 63, Subpart WWWW (applicable portions)
- (27) Table 4 to 40 CFR 63, Subpart WWWW (applicable portions)
- (28) Table 7 to 40 CFR 63, Subpart WWWW (applicable portions)
- (29) Table 9 to 40 CFR 63, Subpart WWWW (applicable portions)
- (30) Table 13 to 40 CFR 63, Subpart WWWW (applicable portions)
- (31) Table 14 to 40 CFR 63, Subpart WWWW (applicable portions)
- (32) Table 15 to 40 CFR 63, Subpart WWWW (applicable portions)

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

Source Name: Better Way Partners, LLC, dba Better Way Products
Source Address: 501 West Railroad Avenue, Syracuse, Indiana 46567
Mailing Address: 70891 County Road 23, New Paris, Indiana, 46553
Part 70 Permit No.: T085-26101-00114

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 AND ENFORCEMENT 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: Better Way Partners, LLC, dba Better Way Products
Source Address: 501 West Railroad Avenue, Syracuse, Indiana 46567
Mailing Address: 70891 County Road 23, New Paris, Indiana, 46553
Part 70 Permit No.: T085-26101-00114

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Better Way Partners, LLC, dba Better Way Products
 Source Address: 501 West Railroad Avenue, Syracuse, Indiana 46567
 Mailing Address: 70891 County Road 23, New Paris, Indiana, 46553
 Part 70 Permit No.: T085-26101-00114
 Facility: All reinforced plastic composites manufacturing operations (PCMV1 - PCMV3, PCM1, SM1, SM2, LG1, BTSG1, BTGL1, BTSFF1, RGR1, RR1, RR2, PGG1, and the associated clean-up solvents for these facilities)
 Parameter: Usage of resins, gel coats, catalysts, and solvents
 Limit: Shall be limited such that the total VOC emissions from these units is less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Source Name: Better Way Partners, LLC, dba Better Way Products
 Source Address: 501 West Railroad Avenue, Syracuse, Indiana 46567
 Mailing Address: 70891 County Road 23, New Paris, Indiana, 46553
 Part 70 Permit No.: T085-26101-00114

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Part 70 Significant Source and
Significant Permit Modification**

Source Description and Location

Source Name:	Better Way Partners, LLC, dba Better Way Products
Source Location:	501 West Railroad Avenue, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3088
Operation Permit No.:	T085-26101-00114
Operation Permit Issuance Date:	June 18, 2008
Significant Source Modification No.:	085-28722-00114
Significant Permit Modification No.:	085-28730-00114
Permit Reviewer:	Stephanie Wilkerson

Source Definition

The Better Way Partners, LLC, dba Better Way Products plant (Better Way), source number 085-00114, will be located in the same building as the Castle BWP, LLC, plant (Castle), source number 085-00111 and the J. P., Inc., dba Jasper Plastic Solutions plant (Jasper), source number 085-00013. IDEM, OAQ examined whether these plants should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) The plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for one or both of the others; and,
- (3) the plants must be located on contiguous or adjacent properties.

The Better Way and Castle plants are under common ownership and common control. The responsible official is the same for both plants. Some of the production managers for Better Way may also manage production at Castle. However, the Jasper plant is owned and controlled by a separate corporation unrelated to Better Way and Castle.

All three plants have the same two-digit SIC code, 30, for Rubber and Miscellaneous Plastic Products.

All three plants will be located on the same property. IDEM, OAQ finds that the Better Way plant and the Castle plant are one major source and will be issued one (1) Part 70 operating permit. IDEM, OAQ further finds that the Jasper plant is not part of the Better Way and Castle major source and Jasper will be issued a separate Part 70 operating permit.

Existing Approvals

The source was issued Part 70 Operating Permit No. 085-26101-00114 on June 18, 2008. There have been no other approvals issued to the source since that date.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment as of June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(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. Kosciusko 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) PM_{2.5}

Kosciusko County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

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

(d) Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	<250
PM ₁₀	<250
PM _{2.5}	<250
SO ₂	0.13
VOC	<250
CO	18.62
NO _x	22.17

HAPs	Potential To Emit (ton/yr)
Styrene/Methyl Methacrylate	<99
All other HAPs	92.33
Total	>99

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) 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).
- (c) These emissions are based upon the Technical Support Document for Part 70 Operating Permit No. 085-26101-00114, issued June 18, 2008.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Better Way Partners, LLC, dba Better Way Products, on December 7, 2009, relating to the addition of four (4) resin and gel coat applicators. The following is a list of the proposed emission units:

- (a) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
- (b) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
- (c) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

Enforcement Issues

There are no pending enforcement actions related to this modification.

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.

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	15.54
PM ₁₀	15.54
PM _{2.5}	15.54
SO ₂	-
VOC	130.26
CO	-
NO _x	-

HAP PTE Before Controls of the Modification	
HAPs	Potential To Emit (ton/yr)
Styrene	90.44
Methyl Methacrylate	24.97
TOTAL	115.41

This source modification is subject to 326 IAC 2-7-10.5(f)(4) and (6), as the potential emissions of the proposed modification are greater than twenty-five (25) tons per year for VOC, greater than ten (10) tons per year of a single HAP, and greater than twenty-five (25) tons per year for combined HAPs. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the addition of the proposed units involves significant changes to the monitoring, reporting, and recordkeeping permit conditions.

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 source

and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)					
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
RGR1	0.00	0.00	-	30.06	-	-
RR1 & RR2	0.00	0.00	-	45.83	-	-
PGG1	0.78	0.78	-	54.37	-	-
Total for Modification	0.78	0.78	-	130.26	-	-
Major Source Threshold or Significant Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. Additionally, the source wishes to remain a minor PSD source; therefore, the proposed units in this modification will be incorporated into the existing PSD minor limit as follows:

- (a) The usage of gel coats, resins, catalysts, and solvents at the reinforced plastic composites manufacturing operations, including the three (3) mixing vats identified as PCMV1 through PCMV3, the one (1) polymer cast molding unit identified as PCM1, the two (2) shear mixing tanks identified as SM1 and SM2, the one (1) open molding booth identified as LG1, the one gel coat application booth identified as BTSG1, the one (1) lamination (chop) booth identified as BTGL1, the one (1) final finish repair unit identified as BTSFF1, the one (1) reciprocator identified as RGR1, the two (2) reciprocators identified as RR1 and RR2, the one (1) portable FIT gel coat application gun identified as PGG1, and the associated clean-up solvents for these facilities, shall be limited such that the total VOC emissions from these units is less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The sourcewide PM/PM₁₀ emissions shall be limited to less than 250 tons per twelve (12) consecutive month period:
 - (1) The coatings applied by the open molding booth identified as LG1, the gel coat application booth identified as BTSG1, the lamination (chop) booth identified as BTSL1, and the final finish repair operations, identified as BTSFF1, the one (1) reciprocator identified as RGR1, the two (2) reciprocators identified as RR1 and RR2, and the one (1) portable FIT gel coat application gun identified as PGG1 shall be limited such that the total PM/PM₁₀ emissions shall not exceed 243 tons per year.
 - (A) The transfer efficiency of the gel coat application shall not be less than 75%.
 - (B) The transfer efficiency of the resin application shall not be less than 95%.
 - (2) The three (3) mixing vats, identified as PCMV1 through PCMV3, and the two (2) shear mixing tanks, identified as SM1 and SM2, shall operate with their covers on, unless loading or unloading of the tanks is occurring, at all times that the tanks are in use to limit the amount of particulate emissions from the mixing operations.

Compliance with these limits will limit the source to less than 250 tons per year of VOC and PM/PM₁₀ emissions, including the potential to emit from all insignificant activities. This will render the requirements of 326 IAC 2-2 (PSD) not applicable.

Federal Rule Applicability Determination

NSPS:

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

NESHAP:

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plastic Parts and Products Surface Coating, Subpart PPPP, because this source does not apply coatings to the reinforced plastic composite products it manufactures.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Boat Manufacturing, Subpart VVVV, because this source does not manufacture boats or boat components.
- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56, because this source manufactures reinforced plastics composites products. The units subject to this rule include the following:
- (1) One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;
 - (2) Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and
 - (3) One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart WWWW:

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799 introduction and (a)
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805
- (11) 40 CFR 63.5810
- (12) 40 CFR 63.5835(a) and (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860(a)
- (15) 40 CFR 63.5895(b)(1), (b)(2), (b)(3), (b)(4), (c), and (d)
- (16) 40 CFR 63.5900(a)(2), (a)(4), (b), (c), and (e)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910

- (19) 40 CFR 63.5915(a)(1), (a)(2), (a)(3), (c), and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935
- (24) Table 1 to 40 CFR 63, Subpart WWWW (applicable portions)
- (25) Table 2 to 40 CFR 63, Subpart WWWW (applicable portions)
- (26) Table 3 to 40 CFR 63, Subpart WWWW (applicable portions)
- (27) Table 4 to 40 CFR 63, Subpart WWWW (applicable portions)
- (28) Table 7 to 40 CFR 63, Subpart WWWW (applicable portions)
- (29) Table 9 to 40 CFR 63, Subpart WWWW (applicable portions)
- (30) Table 13 to 40 CFR 63, Subpart WWWW (applicable portions)
- (31) Table 14 to 40 CFR 63, Subpart WWWW (applicable portions)
- (32) Table 15 to 40 CFR 63, Subpart WWWW (applicable portions)

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

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

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
RGR1 - PM/PM ₁₀	Y	Y	0.00	0.00	100	N	N
RGR1 - VOC	N	Y	30.06	30.06	100	N	N
RR1 & RR2 - PM/PM ₁₀	Y	Y	0.00	0.00	100	N	N
RR1 & RR2 - VOC	N	Y	28.80	28.80	100	N	N
PGG1 - PM/PM ₁₀	Y	Y	15.54	0.78	100	N	N
PGG1 - VOC	N	Y	54.37	54.37	100	N	N

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

State Rule Applicability Determination

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 this source will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this source is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

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

Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from the one (1) portable FIT gel coat application gun identified as PGG1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (1) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) reciprocator identified as RGR1 and the two (2) reciprocators identified as RR1 and RR2 are not subject to this requirement because the potential particulate emissions from these units are each less than 0.551 pounds per hour.

329 IAC 8-1-6 (BACT)

The proposed units each have potential VOC emissions greater than twenty-five (25) tons per year and are to be constructed after the applicability date of January 1, 1980. However, these units are subject to the requirements of 326 IAC 20-56 (Reinforced Plastic Composites Production), and pursuant to 326 IAC 8-1-6(3)(C), is exempt from the requirements of 326 IAC 8-1-6 (BACT).

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.

Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 085-26101-00114. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**. The Table of Contents has been updated as necessary without reproduction herein.

Modification No. 1: The proposed emissions units will be incorporated into Section A.3 as follows:

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:

...

- (d) **One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;**
- (e) **Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and**
- (f) **One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.**

Modification No. 2: The proposed emissions units will be incorporated into Section D.1 as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (d) **One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;**
- (e) **Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and**
- (f) **One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.**

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

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

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) The usage of gel coats, resins, catalysts, and solvents at the reinforced plastic composites manufacturing operations, including the three (3) mixing vats identified as PCMV1 through PCMV3, the one (1) polymer cast molding unit identified as PCM1, the two (2) shear mixing tanks identified as SM1 and SM2, the one (1) open molding booth identified as LG1, the one gel coat application booth identified as BTSG1, the one (1) lamination (chop) booth identified as BTGL1, the one (1) final finish repair unit identified as BTSFF1, **the one (1) reciprocator identified as RGR1, the two (2) reciprocators identified as RR1 and RR2, the one (1) portable FIT gel coat application gun identified as PGG1**, and the associated clean-up solvents for these facilities, shall be limited such that the total VOC emissions from these units is less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The sourcewide PM/PM₁₀ emissions shall be limited to less than 250 tons per twelve (12) consecutive month period:
- (1) The coatings applied by the open molding booth identified as LG1, the gel coat application booth identified as BTSG1, the lamination (chop) booth identified as BTSL1, ~~and~~ the final finish repair operations, identified as BTSFF1, **and the one (1) portable FIT gel coat application gun identified as PGG1** shall be limited such that the total PM/PM₁₀ emissions shall not exceed 243 tons per year.
- (A) The transfer efficiency of the gel coat application shall not be less than 75%.
- (B) The transfer efficiency of the resin application shall not be less than 95%.
- (2) The three (3) mixing vats, identified as PCMV1 through PCMV3, and the two (2) shear mixing tanks, identified as SM1 and SM2, shall operate with their covers on, unless loading or unloading of the tanks is occurring, at all times that the tanks are in use to limit the amount of particulate emissions from the mixing operations.

Compliance with these limits will limit the source to less than 250 tons per year of VOC and PM/PM₁₀ emissions, including the potential to emit from all insignificant activities. This will render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate Matter Emissions [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from the three (3) reinforced plastic composites production booths, identified as LG1, BTSG1, and BTSL1, **and the one (1) portable FIT gel coat application gun identified as PGG1** shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

...

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

D.1.7 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the dry particulate filters, weekly observations shall be made of the overspray from the stacks for the three (3) reinforced plastics composites manufacturing booths (open molding booth stack S1, gel coat application booth stack S2, and lamination (chop) booth stack S3), **and the one (1) portable FIT gel coat application gun identified as PGG1** while the ~~booths~~ units 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 particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These compliance monitoring conditions are necessary because the dry particulate filters for the three (3) booths **and the one (1) portable FIT gel coat application gun** must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70).

Modification No. 3: The proposed units will be incorporated into Section E.1 as follows:

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) polymer cast molding process, consisting of the following emission units:
 - (1) Three (3) covered mixing vats, approved for construction in 2008, identified as PCMV1 through PCMV3, with a total maximum capacity of 105.32 pounds of resin per hour. Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source; and
 - (2) One (1) polymer cast molding unit, approved for construction in 2008, identified as PCM1, with a maximum capacity of 1.67 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (b) One (1) lite granite countertop open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM1, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and
 - (2) One (1) countertop open molding booth, approved for construction in 2008, identified as LG1, using mechanical non-atomized application of resin at a maximum production rate of twenty (20) units per hour, controlled by dry particulate filters, and exhausted through stack S1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.
- (c) One (1) bathtub and shower open molding operation, consisting of the following emission units:
 - (1) One (1) covered shear mixing tank, approved for construction in 2008, identified as SM2, with a maximum capacity of 300 gallons. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;
 - (2) One (1) bathtub and shower gel coat application booth, approved for construction in 2008, identified as BTSG1, using high-volume low-pressure

(HVLP) spray application, with a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S2. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(3) One (1) bathtub and shower lamination (chop) booth, approved for construction in 2008, identified as BTSL1, using mechanical non-atomized application of resin at a maximum capacity of 12.5 units per hour, controlled by dry particulate filters, and exhausted through stack S3. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and

(4) One (1) bathtub and shower final finish open molding parts repair operation, approved for construction in 2008, identified as BTSFF1, using high-volume low-pressure (HVLP) spray application of gel coats and hand application of resins at a maximum capacity of 12.5 units per hour. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

(d) One (1) bulk resin tank, approved for construction in 2008, identified as BT1, with a maximum capacity of 5,000 gallons, and exhausting to stack BTV1. Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(e) **One (1) reciprocator, performing FIT gel coat application and resin flowcoating lamination, identified as RGR1, approved for construction in 2010, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S;**

(f) **Two (2) reciprocators, performing resin flowcoating lamination, identified as RR1 and RR2, approved for construction in 2010, with a combined maximum production rate of 2.00 parts per hour, equipped with dry filter banks for particulate control, and exhausting to stacks RR1-S and RR2-S; and**

(g) **One (1) portable FIT gel coat application gun, identified as PGG1, approved for construction in 2010, with a maximum production rate of 2.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack PGG1-S.**

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

...

Modification No. 4: The proposed units are incorporated into the Quarterly Reporting form as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Better Way Partners, LLC, dba Better Way Products
Source Address: 501 West Railroad Avenue, Syracuse, Indiana 46567
Mailing Address: 70891 County Road 23, New Paris, Indiana, 46553
Part 70 Permit No.: T085-26101-00114

Facility: All reinforced plastic composites manufacturing operations (PCMV1 - PCMV3, PCM1, SM1, SM2, LG1, BTSG1, BTGL1, BTSFF1, **RGR1, RR1, RR2, PGG1**, and the associated clean-up solvents for these facilities)
Parameter: Usage of resins, gel coats, catalysts, and solvents
Limit: Shall be limited such that the total VOC emissions from these units is less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

Modification No. 5: Several of the IDEM, OAQ, branches and sections have been renamed. Therefore, the addresses listed in the permit will be updated as follows.

References to the Permit Administration and Development Section and the Permits Branch have been changed to "Permit Administration and Support Section". References to the Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to "Compliance and Enforcement Branch".

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

**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**

Modification No. 6: Pursuant to the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans), the source submitted an Emergency Reduction Plan within the allowable time frame from the issuance of its Part 70 Operating Permit. Therefore, the language in Condition C.12 has been updated as follows:

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

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

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.~~

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

~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) 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]~~

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.**
- (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]**

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 085-28722-00114 and Significant Permit Modification No. 085-28730-00114. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

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

Company Name: Better Way Partners, LLC, dba Better Way Products
Address, City, IN, Zip: 501 West Railroad Avenue, Syracuse, Indiana 46567
Permit Number: T085-26101-00114
Significant Source Modification No.: 085-28722-00114
Significant Permit Modification No.: 085-28730-00114
Reviewer: Stephanie Wilkerson
Date: 14-Dec-2009

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency
RGR1	AOC C979-GCD-20 - Styrene	9.2	35.00%	11.00	1.000	77	93.31	17.03	100%
	Oxford White Gelcoat - Styrene	11.7	30.00%	4.32	1.000	169.36	102.98	18.79	100%
	Oxford White Gelcoat - MMA	11.7	5.00%	4.32	1.000	75	45.61	8.32	NA
RR1 & RR2	AOC C979-GCD-20 - Styrene	9.2	35.00%	11.00	2.000	77	186.61	34.06	100%
PGG1	Oxford White Gelcoat - Styrene	11.7	30.00%	4.32	2.000	169.36	205.97	37.59	95%
	Oxford White Gelcoat - MMA	11.7	5.00%	4.32	2.000	75	91.21	16.65	NA

Total VOC/HAP and PM from Resin and Gel Use 115.41**

Particulate Control Efficiency of Dry Filter Banks 95%
Particulate Emissions After Controls 0.78 ton

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

**Emissions unit RGR1 can only apply the gel cor or the resin at one time. Therefore, the worst-case material/operation is counted toward the total PTE.

METHODOLOGY

Assume all of the monomer is styrene.

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

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

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table. An interpolation calculator page for those styrene contents between the values given in the table

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

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

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

VOC Emissions

From Miscellaneous Solvent Use

Company Name: Better Way Partners, LLC, dba Better Way Products
Address, City, IN, Zip: 501 West Railroad Avenue, Syracuse, Indiana 46567
Permit Number: T085-26101-00114
Significant Source Modification No.: 085-28722-00114
Significant Permit Modification No.: 085-28730-00114
Reviewer: Stephanie Wilkerson
Date: 10-Dec-2009

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
RGR1														
	Zyvax Fiberglass Shield	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	0.10000	1.000	6.57	6.57	0.66	15.77	2.88
	MEKP - Catalyst	8.3	4.00%	2.0%	2.0%	2.0%	0.00%	0.09000	1.000	0.17	0.17	0.02	0.36	0.07
RR1 & RR2														
	Zyvax Fiberglass Shield	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	0.20000	2.000	6.57	6.57	2.63	63.07	11.51
	MEKP - Catalyst	8.3	4.00%	2.0%	2.0%	2.0%	0.00%	0.18000	2.000	0.17	0.17	0.06	1.44	0.26
PGG1														
	MEKP - Catalyst	8.3	4.00%	2.0%	2.0%	2.0%	0.00%	0.09000	2.000	0.17	0.17	0.03	0.72	0.13

Potential Emissions

Add worst case coating to all solvents

3.39

81.36

14.85

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Pat Hare
Better Way Partners, LLC dba Better Way Products
70891 CR 23
New Paris, IN 46553

DATE: February 24, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Part 70 SSM
085-28722-00114

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Clint Decker
Kevin Parks
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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

February 24, 2010

TO: Syracuse Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Better Way Partners, LLC dba Better Way Products
Permit Number: 085-28722-00114

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 2/24/2010 Better Way Partners, LLC dba Better Way Products 085-28722-00114 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Pat Hare Better Way Partners, LLC dba Better Way Products 70891 CR 23 New Paris IN 46553 (Source CAATS)									
2		Clint Decker COO Better Way Partners, LLC dba Better Way Products 70891 CR 23 New Paris IN 46553 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Oceola IN 46561 (Consultant)									
5		Syracuse Town Council and Town Manager 310 N. Huntington St. Syracuse IN 46567 (Local Official)									
6		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)									
7		Syracuse Public Library 115 East Main Street Syracuse IN 46567 (Library)									
8		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)									
9		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)									
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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