



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.

Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Mr. Michael Cira, EHS Manager
TAG Specialty Products
28858 Ventura Drive
Elkhart, IN 46517

Re: 039-31450-00076
First Significant Permit Modification to:
Part 70 Permit (2nd Renewal) No.: T039-28811-00076

Dear Mr. Cira,

TAG Specialty Products was issued Part 70 operating permit (2nd Renewal) No T039-28811-00076 on May 17, 2010, for a stationary fiberglass component manufacturing plant. A letter requesting changes to this permit was received on February 6, 2012. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification involves the addition of a synthetic minor limitation for VOCs in order to make the source a minor source under Prevention of Significant Deterioration under 326 IAC 2-2.

All other conditions of the permit shall remain unchanged and in effect. Please find enclosed the entire revised permit.

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 Madhurima Moulik, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for Madhurima Moulik or extension (3-0868), or dial (317) 233-0868.

Sincerely,

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MDM

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance and Enforcement



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**TAG Specialty Products
1131 D.I. Drive
Elkhart, Indiana 46514**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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 2-7-10.5, applicable to those conditions.

Operation Permit No.: T039-28811-00076	
Issued by/Original Signed by:	Issuance Date: May 17, 2010
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: May 17, 2015

Administrative Amendment No. 039-30739-00076, issued on August 9, 2011

First Minor Permit Modification No. 039-29852-00076, issued on February 4, 2011

Second Minor Permit Modification No. 039-30860-00076 issued on December 1, 2011

First Significant Permit Modification No. 039-31450-00076	
Issued by:	Issuance Date:
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: May 17, 2015

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	1131 D.I. Drive, Elkhart, Indiana 46514
General Source Phone Number:	(574) 264-7528
SIC Code:	3089, 3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD rules
	Major Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

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

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

- (a) One (1) paint booth, identified as Spray Booth #1, constructed in 1976, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (b) One (1) spray booth, identified as Spray Booth # 2, constructed in 1990, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM
- (c) One (1) paint/clear coat booth, identified as Paint/Clear Booth # 3, constructed in 1993, and consisting of: one (1) air-assisted airless gun for clear coating, one (1) HVLP gun for painting which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to two (2) stacks. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.

- (d) One (1) clear coat booth, identified as Paint/Clear Booth # 4, constructed in 1992 and consisting of: one (1) air-assisted airless gun for coating which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit, and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (e) One (1) chop booth and one (1) ledge lamination area, identified as Main Glass Plant Chop Booth and Ledge Lamination Area, each constructed in 1976, and consisting of: two (2) non-atomizing resin applicators, hand lay-up operations and associated solvent cleaning operations, each applicator with a maximum capacity of 437 pounds of neat resin per hour, and using dry filters for particulate control, exhausting to two (2) stacks. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (f) One (1) gel coat booth, identified as the Main Glass Plant Gel Coat Booth, constructed in 1976, consisting of: one (1) air assisted applicator, one (1) Fluid Impingement Technology (FIT) non-atomizing clear gel coat applicator, identified as CGG1 (approved for construction in 2011), and the associated solvent cleaning operations, with a maximum capacity of 118 pounds of fiberglass gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (g) One (1) gel coat booth, identified as Research and Development Gel Coat Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 13.8 pounds of gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (h) One (1) chop booth, identified as Research and Development Chop Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 50.2 pounds of resin per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (i) One (1) fiberglass truck cap spray adhesive application, identified as Adhesive Booth C, constructed in 1976, consisting of: an air-assisted airless spray system with a maximum capacity of 1.0 gallon of adhesive per hour, and dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subparts MMMM and PPPP, this is considered an existing plastic parts coating operation.
- (j) One (1) paint mix room, identified as PMR1, constructed in 1976, with a maximum throughput capacity of 14.5 gallons of mixed paint per hour (all liquid suspension), and exhausting to stack PMR1-S. This facility is considered an existing affected facility under 40 CFR 63, Subparts MMMM and PPPP.
- (k) One (1) resin transfer molding operation, identified as RTM1, approved in 2010 for construction, with a maximum production rate of 0.88 unit per hour. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.
- (l) Two (2) mechanical non-atomizing resin applicators in two spray booths, approved for

construction in 2011, identified as HLMA1 and HLMA2, respectively, exhausting into the building. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.

- (m) Four (4) manual resin hand layup areas, identified as HLA1, HLA2, HLA3, HLA4, respectively, exhausting in the building. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with filters scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grain per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Tonneau assembly area: [326 IAC 6-3-2].
 - (A) Miscellaneous woodworking operations to cut shipping mounting boards.
 - (B) One (1) combination grinding booth.
 - (2) Main glass plant: [326 IAC 6-3-2].
 - (A) One (1) combination grinding booth.
 - (B) Miscellaneous woodworking operations to cut shipping mounting boards.
 - (C) Paint preparation scuff sanding room.
 - (D) One (1) combination booth (Main Glass Plant #1) with sanding operations and a central dust collection system (CDC1), exhausting to stack CDC1-S.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM and PM10; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Twelve (12) hand grinders [326 IAC 6-3-2];
 - (2) One (1) tonneau cover adhesive application station, identified as Adhesive Booth T, a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system and consisting of two (2) application stations. [40 CFR Part 63, Subparts MMMM and PPPP];
 - (3) One (1) gelcoat storage and mixing room [40 CFR Part 63, Subpart WWWW];

and

- (4) Metal strip cutting operation [326 IAC 6-3-2].

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

- (a) This permit, T039-28811-00076, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (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, or 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 Office of Air Quality, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by a "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.

B.12 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.13 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 T039-28811-00076 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.16 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

- (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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 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 or notice 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.19 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.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.23 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.24 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 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 a "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.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, 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 a certification by a "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 a certification by a "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.9 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.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) Reserved
- (e) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

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

Reports required in this part 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

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

Stratospheric Ozone Protection

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

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 applicable standards for recycling and emissions reduction.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint booth, identified as Spray Booth #1, constructed in 1976, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (b) One (1) spray booth, identified as Spray Booth # 2, constructed in 1990, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (c) One (1) paint/clear coat booth, identified as Paint/Clear Booth # 3, constructed in 1993, and consisting of: one (1) air-assisted airless gun for clear coating, one (1) HVLP gun for painting which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to two (2) stacks. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (d) One (1) clear coat booth, identified as Paint/Clear Booth # 4, constructed in 1992 and consisting of: one (1) air-assisted airless gun for coating which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit, and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility considered an existing affected facility under to 40 CFR 63, Subpart MMMM.
- (e) One (1) chop booth and one (1) ledge lamination area, identified as Main Glass Plant Chop Booth and Ledge Lamination Area, each constructed in 1976, and consisting of: two (2) non-atomizing resin applicator, hand lay-up operations and associated solvent cleaning operations, each applicator with a maximum capacity of 437 pounds of neat resin per hour, and using dry filters for particulate control, exhausting to two (2) stacks. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (f) One (1) gel coat booth, identified as the Main Glass Plant Gel Coat Booth, constructed in 1976, consisting of: one (1) air assisted applicator, one (1) Fluid Impingment Technology (FIT) non-atomizing clear gel coat applicator, identified as CGG1 (approved for construction in 2011), and the associated solvent cleaning operations, with a maximum capacity of 118 pounds of fiberglass gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

- (g) One (1) gel coat booth, identified as Research and Development Gel Coat Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 13.8 pounds of gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (h) One (1) chop booth, identified as Research and Development Chop Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 50.2 pounds of resin per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (i) One (1) fiberglass truck cap spray adhesive application, identified as Adhesive Booth C, constructed in 1976, consisting of: an air-assisted airless spray system with a maximum capacity of 1.0 gallon of adhesive per hour, and dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subparts MMMM and PPPP, this is considered an existing plastic parts coating operation.
- (j) One (1) paint mix room, identified as PMR1, constructed in 1976, with a maximum throughput capacity of 14.5 gallons of mixed paint per hour (all liquid suspension), and exhausting to stack PMR1-S. This facility is considered an existing affected facility under 40 CFR 63, Subparts MMMM and PPPP.

(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 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to T 039-17557-00076, issued on October 20, 2006, the VOC input to Spray Booth # 2, Paint/Clear Booth #3 and Paint/Clear Booth #4 shall be less than twenty-five (25) tons per twelve consecutive month period, each with compliance determined at the end of each month. Compliance with these limits is equivalent to VOC emissions of less than twenty-five (25) tons per year per booth and will render the requirements of 326 IAC 8-1-6 not applicable to these facilities.

D.1.2 Volatile Organic Compounds [326 IAC 2-2]

All operations, including the use of paints, resins, gel coats, coatings, dilution solvents, and cleaning solvents, at the following operations shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than a total of 245.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4, Main Glass Plant Chop Booth and Ledge Lamination Area, Main Glass Plant Gel Coat Booth, Research and Development Gel Coat Booth, Research and Development Chop Booth, Adhesive Booth C, Paint Mix Room (PMR1), Combination Booth (Main Glass Plant #1), One (1) tonneau cover adhesive application station (Adhesive Booth T), Four (4) manual resin hand layup areas (HLA1, HLA2, HLA3, HLA4), resin transfer molding operation (RTM1), Main Glass Plant Paint scuff sanding room, tonneau application stations, hand grinders, mechanical non-atomizing resin applicators in two spray booths, approved for construction in 2011, identified as HLMA1 and HLMA2, main glass plant gelcoat mix room, paint preparation, clear gelcoat applicator, putty applicators, fluid impingement resin applicators.

Compliance with this limit, in conjunction with the VOC emissions from other insignificant

activities at this source, shall ensure that the source-wide VOC emissions remain below 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, rendering 326 IAC 2-2 not applicable.

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

Pursuant to 326 IAC 6-3-2(d), the particulate emissions from Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4, and the Main Glass Plant Gel Coat Booth shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Reinforced Plastics Composites Production [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 employer(s).
- (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.

Records of prior training programs and former personnel are not required to be maintained.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (a) Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the limits in Condition D.1.2 shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin, gel coat, coating, dilution solvent and cleaning solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each material by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all materials. Emission factors shall be obtained from a reference approved by IDEM, OAQ.
 - (2) The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 2001. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating and reinforced plastics production booth stacks while one or more of the booths are in operation. Section C – Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Section C – Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The usage by weight and monomer content of each resin and gel coat used at the fiberglass operations. 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.
 - (4) Method of application for each resin and gel coat used.
 - (5) The source-wide VOC emissions for each month.
 - (6) The total monthly VOC usage at Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4.
- (b) To document the compliance status with Condition D.1.4(c), 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
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and the daily and monthly inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (a) Grinding and machining operations controlled with filters scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grain per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Tonneau assembly area: [326 IAC 6-3-2].
 - (A) Miscellaneous woodworking operations to cut shipping mounting boards.
 - (B) One (1) combination grinding booth.
 - (2) Main glass plant: [326 IAC 6-3-2].
 - (A) One (1) combination grinding booth.
 - (B) Miscellaneous woodworking operations to cut shipping mounting boards.
 - (C) Paint preparation scuff sanding room.
 - (D) One (1) combination booth (Main Glass Plant #1) with sanding operations and a central dust collection system (CDC1), exhausting to stack CDC1-S.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (c) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM and PM₁₀; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Twelve (12) hand grinders [326 IAC 6-3-2].
 - (4) Metal strip cutting operation [326 IAC 6-3-2].

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following insignificant activities:

- (1) Miscellaneous woodworking operations (Tonneau assembly area);
- (2) Combination grinding booth (Tonneau assembly area);
- (3) Combination grinding booth (Main glass plant);

- (4) Miscellaneous woodworking operations (Main glass plant);
- (5) Scuff sanding room;
- (6) Brazing equipment, cutting torches, soldering equipment, welding equipment;
- (7) Twelve (12) hand grinders;
- (8) One (1) combination booth (Main Glass Plant #1) with sanding operations and a central dust collection system (CDC1), exhausting to stack CDC1-S; and
- (9) Metal strip cutting operation.

shall be limited by the following:

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

SECTION E.1 FACILITY OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(15)]:

These emission units are subject to the provisions of 40 CFR 63, Subpart PPPP:

- (a) One (1) paint booth, identified as Spray Booth #1, constructed in 1976, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (b) One (1) spray booth, identified as Spray Booth # 2, constructed in 1990, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (c) One (1) paint/clear coat booth, identified as Paint/Clear Booth # 3, constructed in 1993, and consisting of: one (1) air-assisted airless gun for clear coating, one (1) HVLP gun for painting which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to two (2) stacks. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart MMMM.
- (d) One (1) clear coat booth, identified as Paint/Clear Booth # 4, constructed in 1992 and consisting of: one (1) air-assisted airless gun for coating which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit, and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation. This facility considered an existing affected facility under to 40 CFR 63, Subpart MMMM.
- (j) One (1) fiberglass truck cap spray adhesive application, identified as Adhesive Booth C, constructed in 1976, consisting of: an air-assisted airless spray system with a maximum capacity of 1.0 gallon of adhesive per hour, and dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart PPPP, this is considered an existing plastic parts coating operation.
- (k) One (1) paint mix room, identified as PMR1, constructed in 1976, with a maximum throughput capacity of 14.5 gallons of mixed paint per hour (all liquid suspension), and exhausting to stack PMR1-S. This facility is considered an existing affected facility under 40 CFR 63, Subparts MMMM and PPPP.

Insignificant Activities

- (2) One (1) tonneau cover adhesive application station, identified as Adhesive Booth T, a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system and consisting of two (2) application stations. Under 40 CFR Part 63, Subparts MMMM and PPPP, this is considered an existing plastic parts coating operation.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Surface Coating of Plastic Parts and Products [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.4501, 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 40 CFR Part 63, Subpart PPPP, in accordance with the schedule in 40 CFR Part 63, Subpart PPPP.

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products: Requirements [40 CFR Part 63, Subpart PPPP]

Pursuant to 40 CFR Part 63, Subpart PPPP, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart PPPP, all activities associated with the surface coating of plastic parts and products as follows: A copy of the rule is included as Attachment B.

- (1) 40 CFR 63.4481(a)(1) - (2)
- (2) 40 CFR 63.4481(b)
- (3) 40 CFR 63.4482(a)
- (4) 40 CFR 63.4482(b)
- (5) 40 CFR 63.4482(e)
- (6) 40 CFR 63.4483(b)
- (7) 40 CFR 63.4483(d)
- (8) 40 CFR 63.4490(b)(1)
- (9) 40 CFR 63.4491(a)
- (10) 40 CFR 63.4491(b)
- (11) 40 CFR 63.4500(a)(1)
- (12) 40 CFR 63.4500(b)
- (13) 40 CFR 63.4501
- (14) 40 CFR 63.4510(a) and (b)
- (15) 40 CFR 63.4510(c)(1) – (c)(8)(ii)
- (16) 40 CFR 63.4520(a)(1) – (a)(3)(v), (a)(4) – (a)(6)(iii)
- (17) 40 CFR 63.4530(a) – (c)(3)
- (18) 40 CFR 63.4530(d) – (h)
- (19) 40 CFR 63.4531
- (20) 40 CFR 63.4540
- (21) 40 CFR 63.4541
- (22) 40 CFR 63.4542
- (23) 40 CFR 63.4550
- (24) 40 CFR 63.4551
- (25) 40 CFR 63.4552
- (26) 40 CFR 63.4563(a)
- (27) 40 CFR 63.4563(b)
- (28) 40 CFR 63.4563(j)
- (29) 40 CFR 63.4580

- (30) 40 CFR 63.4581
- (31) Table 2 to 40 CFR 63 Subpart PPPP (the applicable portions)
- (32) Table 3 to 40 CFR 63 Subpart PPPP (the applicable portions)
- (33) Table 4 to 40 CFR 63 Subpart PPPP (the applicable portions)

SECTION E.2

FACILITY OPERATION CONDITIONS

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

These emission units are subject to the provisions of 40 CFR 63, Subpart Mmmm:

- (a) One (1) paint booth, identified as Spray Booth #1, constructed in 1976, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart Pppp, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart Mmmm.
- (b) One (1) spray booth, identified as Spray Booth # 2, constructed in 1990, and consisting of: one (1) HVLP spray gun for painting and associated solvent cleaning and coating mixing operations which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to one (1) stack. Under 40 CFR Part 63, Subpart Pppp, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart Mmmm.
- (c) One (1) paint/clear coat booth, identified as Paint/Clear Booth # 3, constructed in 1993, and consisting of: one (1) air-assisted airless gun for clear coating, one (1) HVLP gun for painting which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour; using dry filters for particulate control; exhausting to two (2) stacks. Under 40 CFR Part 63, Subpart Pppp, this is considered an existing plastic parts coating operation. This facility is considered an existing affected facility under 40 CFR 63, Subpart Mmmm.
- (d) One (1) clear coat booth, identified as Paint/Clear Booth # 4, constructed in 1992 and consisting of: one (1) air-assisted airless gun for coating which also includes painting of fiberglass and aluminum truck covers (1.25 aluminum units per hour combined (Spray booths 1-4)), one (1) 1.3 MMBtu/hr natural gas-fired air-make-up unit, and associated solvent cleaning and coating mixing operations, with a maximum capacity of 41.4 pounds of VOC per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subpart Pppp, this is considered an existing plastic parts coating operation. This facility considered an existing affected facility under to 40 CFR 63, Subpart Mmmm.
- (i) One (1) fiberglass truck cap spray adhesive application, identified as Adhesive Booth C, constructed in 1976, consisting of: an air-assisted airless spray system with a maximum capacity of 1.0 gallon of adhesive per hour, and dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR Part 63, Subparts Mmmm and Pppp, this is considered an existing plastic parts coating operation.
- (k) One (1) paint mix room, identified as PMR1, constructed in 1976, with a maximum throughput capacity of 14.5 gallons of mixed paint per hour (all liquid suspension), and exhausting to stack PMR1-S. This facility is considered an existing affected facility under 40 CFR 63, Subparts Mmmm and Pppp.

Insignificant Activities:

- (d) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM and PM₁₀; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (2) One (1) tonneau cover adhesive application station, identified as Adhesive Booth T, a maximum usage of 0.20 gallon per hour, using air-assisted airless spray system and consisting of two (2) application stations. Under 40 CFR Part 63, Subparts PPPP and MMMM, this is considered an existing plastic parts coating operation.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements:
Surface Coating of Miscellaneous Metal Parts and Products [326 IAC 2-7-5(1)]**

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.3901, 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, for the affected facilities, as specified in Table 2 of 40 CFR Part 63, Subpart MMMM, in accordance with the schedule in 40 CFR 63, Subpart MMMM.

E.2.2 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products: Requirements [40 CFR Part 63, Subpart MMMM]

Pursuant to 40 CFR Part 63, Subpart MMMM, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart MMMM for all of the activities associated with the surface coating of metal parts and products as follows: A copy of the rule is included as Attachment A.

- (1) 40 CFR 63.3881(e)(2)

SECTION E.3

FACILITY OPERATION CONDITIONS

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

These emission units are subject to the provisions of 40 CFR 63, Subpart WWWW:

- (e) One (1) chop booth and one (1) ledge lamination area, identified as Main Glass Plant Chop Booth and Ledge Lamination Area, each constructed in 1976, and consisting of: two (2) non-atomizing resin applicators, hand lay-up operations and associated solvent cleaning operations, each applicator with a maximum capacity of 437 pounds of neat resin per hour, and using dry filters for particulate control, exhausting to two (2) stacks. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (f) One (1) gel coat booth, identified as the Main Glass Plant Gel Coat Booth, constructed in 1976, consisting of: one (1) air assisted applicator and the associated solvent cleaning operations, with a maximum capacity of 118 pounds of fiberglass gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (g) One (1) gel coat booth, identified as Research and Development Gel Coat Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 13.8 pounds of gel coat per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (h) One (1) chop booth, identified as Research and Development Chop Booth, constructed in 1976, and consisting of: one (1) non-atomizing resin applicator and associated solvent cleaning operations with a maximum capacity of 50.2 pounds of resin per hour and using dry filters for particulate control, exhausting to one (1) stack. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.
- (k) One (1) resin transfer molding operation, identified as RTM1, approved in 2010 for construction, with a maximum production rate of 0.88 unit per hour. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.
- (l) Two (2) Fluid Impingement Technology (FIT) mechanical non-atomizing resin applicators in two spray booths, approved for construction in 2011, identified as HLMA1 and HLMA2, respectively, exhausting into the building. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.
- (m) Four (4) manual resin hand layup areas, identified as HLA1, HLA2, HLA3, HLA4, respectively, exhausting in the building. Under 40 CFR 63, Subpart WWWW, this is an affected unit at an affected source.

Insignificant Activities

- (d) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM and PM10; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (3) One (1) gelcoat storage and mixing room Under 40 CFR 63, Subpart WWWW,

this is considered an existing open molding reinforced plastic composites production operation

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements:
Reinforced Plastics Composites Production [326 IAC 2-7-5(1)]**

E.3.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (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, for all activities associated with the production of reinforced plastic composites as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR Part 63, Subpart WWWW.

E.3.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: Requirements [40 CFR Part 63, Subpart WWWW]

Pursuant to 40 CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart WWWW as follows: A copy of the rule is included as Attachment C.

- (1) 40 CFR 63.5785(a)
- (2) 40 CFR 63.5790
- (3) 40 CFR 63.5795(b)
- (4) 40 CFR 63.5796
- (5) 40 CFR 63.5797
- (6) 40 CFR 63.5798
- (7) 40 CFR 63.5799
- (8) 40 CFR 63.5800
- (9) 40 CFR 63.5805(b)
- (10) 40 CFR 63.5810
- (11) 40 CFR 63.5835(a) and (c)
- (12) 40 CFR 63.5840
- (13) 40 CFR 63.5860(a)
- (14) 40 CFR 63.5895 (c) and (d)
- (15) 40 CFR 63.5900(a)(2), (3) and (4), (b) and (c)
- (16) 40 CFR 63.5905
- (17) 40 CFR 63.5910(a), (b), (c), (d), (g), (h) and (i)
- (18) 40 CFR 63.5915(a), (c) and (d)
- (19) 40 CFR 63.5920
- (20) 40 CFR 63.5925
- (21) 40 CFR 63.5930
- (22) 40 CFR 63.5935
- (23) Table 1 (the applicable portions)
- (24) Table 3 (the applicable portions)
- (25) Table 4 (the applicable portions)
- (26) Table 7 (the applicable portions)
- (27) Table 8 (the applicable portions)
- (28) Table 9 (the applicable portions)
- (29) Table 13 (the applicable portions)
- (30) Table 14 (the applicable portions)
- (31) Table 15

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076

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: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076

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: _____

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

Part 70 Quarterly Report

Source Name: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076
Facility: Spray Booth # 2, Paint/Clear Booth #3 and Paint/Clear Booth #4
Parameter: VOC
Limit: VOC input to each booth shall not exceed 25 tons per twelve (12) consecutive month period per booth 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: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076
Facility:

Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4, Main Glass Plant Chop Booth and Ledge Lamination Area, Main Glass Plant Gel Coat Booth, Research and Development Gel Coat Booth, Research and Development Chop Booth, Adhesive Booth C, Paint Mix Room (PMR1), Combination Booth (Main Glass Plant #1), One (1) tonneau cover adhesive application station (Adhesive Booth T), Four (4) manual resin hand layup areas (HLA1, HLA2, HLA3, HLA4), resin transfer molding operation (RTM1), Main Glass Plant Paint scuff sanding room, tonneau application stations, hand grinders, mechanical non-atomizing resin applicators in two spray booths, approved for construction in 2011, identified as HLMA1 and HLMA2, main glass plant gelcoat mix room, paint preparation, clear gelcoat applicator, putty applicators, fluid impingement resin applicators.

Parameter: VOC emissions
Limit: VOC emissions shall be less than 245.8 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: _____

**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: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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: _____

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

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

Source Description and Location

Source Name:	TAG Specialty Products
Source Location:	1131 DI Drive, Elkhart, IN 46514
County:	Elkhart County
SIC Code:	3089
Operation Permit (Renewal) No.:	T039-28811-00076
Operation Permit Issuance Date:	May 17, 2010
Significant Permit Modification No.:	039-31450-00076
Permit Reviewer:	Madhurima Moulik

Existing Approvals

The source was issued Part 70 Operating Permit No. T039-28811-00076 on March 17, 2010. The source has since received the following approvals:

- (a) Minor Source Modification No. 039-29822-00076 issued on December 8, 2010;
- (b) Minor Permit Modification No. 039-29852-00076 issued on February 4, 2011;
- (c) Administrative Amendment No. 039-30739-00076 issued on August 9, 2011;
- (d) Minor Source Modification No. 039-30832-00076 issued on October 7, 2011; and
- (e) Minor Permit Modification No. 039-30860-00076 issued on December 1, 2011.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, 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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

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

- (b) **PM_{2.5}**
Elkhart 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. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective on June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Elkhart County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability section.

Fugitive Emissions

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

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	<100
PM ₁₀	<100
PM _{2.5}	<100
SO ₂	---
VOC	>250
CO	---
NO _x	---
GHGs as CO ₂ e	<100,000
Single HAP	>10
Combination HAPs	>25

--- Negligible

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) These emissions are based upon the Technical Support Document for Minor Permit Modification No. 039-30860-00076 issued in December 1, 2011.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a permit modification application, submitted by TAG Specialty Products on February 6, 2012. This facility is currently classified as a major source under Prevention of Significant Deterioration (PSD) rules as included in 326 IAC 2-2. The Permittee has requested a source-wide emission limitation of less than 250 tons per year, in

order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) no longer applicable to this facility, making it a minor PSD source.

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.

Federal Rule Applicability Determination

There are no changes to the federal rule applicabilities as a result of this modification.

State Rule Applicability Determination

326 IAC 2-2 (PSD)

This source is currently classified as a major source under Prevention of Significant Deterioration (PSD) rules under 326 IAC 2-2, because the source-wide VOC potential to emit is greater than 250 tons per year. The Permittee has requested that the total VOC emissions from the source be limited to less than 250 tons per year, making this source a minor source under PSD rules.

The Permittee has requested a limit of less than 245.8 tons per year of VOC emissions for the paint booths and fiberglass operations, including the use of cleanup solvents. This limit, in conjunction with the VOC emissions from insignificant activities at this source, shall ensure that the source-wide VOC emissions are less than 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, rendering 326 IAC 2-2 not applicable.

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.

The Compliance Determination Requirements applicable to this modification are as follows:

The Permittee has applied for a VOC synthetic minor limit of 245.8 tons per year in order to render PSD rules under 326 IAC 2-2 not applicable. In order to demonstrate compliance with this limit, the Permittee is subject to the following compliance determination requirements:

- (1) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin, gel coat, coating, dilution solvent and cleaning solvent. Volatile organic

compound emissions shall be calculated by multiplying the usage of each material by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all materials. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

- (2) The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 2001. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

The compliance monitoring requirements applicable to this modification are as follows:

The compliance monitoring conditions shall remain unchanged.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit (Renewal) No. T039-28811-00076. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- (a) Section A.1 has been modified to change the source status to a minor source under PSD rules (326 IAC 2-2).
- (b) New Condition D.1.2 – Volatile Organic Compounds [326 IAC 2-2] has been added to include a PSD minor limit for VOCs emitted from the painting and fiberglass operations at this source.
- (c) Condition D.1.5 (now D.1.6) – Volatile Organic Compounds has been modified to include the compliance determination requirements for the new PSD minor limitation on VOCs emitted from the surface coating and fiberglass operations.

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

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

Source Address:	1131 D.I. Drive, Elkhart, Indiana 46514
General Source Phone Number:	(574) 264-7528
SIC Code:	3089, 3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Major Minor Source, under PSD rules
	Major Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

D.1.2 Volatile Organic Compounds [326 IAC 2-2]

All operations, including the use of paints, resins, gel coats, coatings, dilution solvents, and cleaning solvents, at the following operations shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than a total of 245.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4, Main Glass Plant Chop Booth and Ledge Lamination Area, Main Glass Plant Gel Coat Booth, Research and Development Gel Coat Booth, Research and Development Chop Booth, Adhesive Booth C, Paint Mix Room (PMR1), Combination Booth (Main Glass Plant #1), One (1) tonneau cover adhesive application station (Adhesive Booth T), Four (4) manual resin hand layup areas (HLA1, HLA2, HLA3, HLA4), resin transfer molding operation (RTM1),

Main Glass Plant Paint scuff sanding room, tonneau application stations, hand grinders, mechanical non-atomizing resin applicators in two spray booths, approved for construction in 2011, identified as HLMA1 and HLMA2, main glass plant gelcoat mix room, paint preparation, clear gelcoat applicator, putty applicators, fluid impingement resin applicators.

Compliance with this limit, in conjunction with the VOC emissions from other insignificant activities at this source, shall ensure that the source-wide VOC emissions remain below 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, rendering 326 IAC 2-2 not applicable.

D.1.56 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (a)** Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the limits in Condition D.1.2 shall be determined based upon the following criteria:**
- (1) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin, gel coat, coating, dilution solvent and cleaning solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each material by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all materials. Emission factors shall be obtained from a reference approved by IDEM, OAQ.**
 - (2) The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 2001. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.**

D.1.78 Record Keeping Requirements

- (a)** To document the compliance status with Conditions D.1.1 **and** D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.1 **and** D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.**
 - (2) The amount of coating material and solvent less water used on a monthly basis.**
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) The usage by weight and monomer content of each resin and gel coat used at the fiberglass operations. 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.

- (4) Method of application for each resin and gel coat used.**
- ~~(3)~~ **(5) The source-wide total VOC usage emissions for each month.**
- (6) The total monthly VOC usage at Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4.**
- (b) To document the compliance status with Condition ~~D.1.3(c)~~ **D.1.4(c)**, 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
- (c) To document the compliance status with Condition D.1.67, the Permittee shall maintain a log of weekly overspray observations and the daily and monthly inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.89 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions **D.1.1 and D.1.2** shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: TAG Specialty Products
Source Address: 1131 D.I. Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-28811-00076
Facility:

Spray Booth # 1, Spray Booth # 2, Paint/Clear Booth # 3, Paint/Clear Booth # 4, Main Glass Plant Chop Booth and Ledge Lamination Area, Main Glass Plant Gel Coat Booth, Research and Development Gel Coat Booth, Research and Development Chop Booth, Adhesive Booth C, Paint Mix Room (PMR1), Combination Booth (Main Glass Plant #1), One (1) tonneau cover adhesive application station (Adhesive Booth T), Four (4) manual resin hand layup areas (HLA1, HLA2, HLA3, HLA4), resin transfer molding operation (RTM1), Main Glass Plant Paint scuff sanding room, tonneau application stations, hand grinders, mechanical non-atomizing resin applicators in two spray booths, approved for construction in 2011, identified as HLMA1 and HLMA2, main glass plant gelcoat mix room, paint preparation, clear gelcoat applicator, putty applicators, fluid impingement resin applicators.

Parameter: VOC emissions

Limit: VOC emissions shall be less than 245.8 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: _____

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-31450-00076. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov