



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

TO: Interested Parties / Applicant

DATE: June 18, 2013

RE: Insul-Coustic Corporation / 003-33263-00343

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

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-AM.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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[www.idem.IN.gov](http://www.idem.IN.gov)

June 18, 2013

Mr. W. Kirk Cunningham  
Insul-Coustic Corporation  
2701 South Coliseum Boulevard, Suite 1286  
Fort Wayne, IN 46803

Re: 003-33263-00343  
First Administrative Amendment to  
M003-31245-00343

Dear Mr. Cunningham:

Insul-Coustic Corporation was issued a First Minor Source Operating Permit (MSOP) Renewal No. M003-31245-00343 on April 19, 2012 for a stationary fiberglass parts processing plant that produces cured and laminated fiberglass parts from uncured fiberglass parts located at 2701 South Coliseum Boulevard, in Fort Wayne, Indiana. On May 31, 2013, the Office of Air Quality (OAQ) received an application from the source requesting:

- (1) to add new emission units that is of the same type as the other permitted equipment. This is considered an Administrative Amendment pursuant to 326 IAC 2-6.1-6(d) (8).
- (2) to change capacity of an existing unit. This change to the permit is considered an Administrative Amendment pursuant to 326 IAC 2-6.1-6(d) (2), since this is a change in descriptive information concerning the source or emissions unit or units.

Pursuant to 326 IAC 2-6.1-6, the MSOP is hereby revised as described in the attached Technical Support Document (TSD).

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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 Muhammad D. Khan, of my staff, at 317-233-9664 or 1-800-451-6027, and ask for extension 3-9664.

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Insul-Coustic Corporation  
Fort Wayne, Indiana

Page 2 of 2  
Administrative Amendment No. 003-33263-00343

Attachments: Updated Permit,  
TSD  
PTE Calculations

DK

cc: File - Allen County  
Allen County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch



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**Minor Source Operating Permit Renewal with  
New Source Review  
OFFICE OF AIR QUALITY**

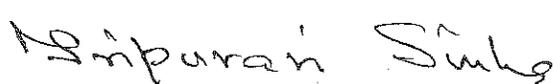
**Insul-Coustic Corporation  
2701 South Coliseum Boulevard  
Fort Wayne, Indiana 46803**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M003-31245-00343	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 19, 2012 Expiration Date: April 19, 2022

1 <sup>st</sup> Administrative Amendment No.: 003-33263-00343	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 18, 2013 Expiration Date: April 19, 2022

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary fiberglass parts processing plant that produces cured and laminated fiberglass parts from uncured fiberglass parts.

Source Address:	2701 South Coliseum Blvd., Fort Wayne, Indiana 46803
General Source Phone Number:	(260) 420-1480
SIC Code:	3296 (Mineral Wool)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) molding operation, constructed in 2002, consisting of Press 101, Press 102, Press 103, Press 104, and Press 105, with maximum capacities of 121.6, 156.1, 115.4, 104.1, and 28.9 pounds per hour, respectively and exhausting to the Vent #2.
- (b) One (1) molding operation approved for construction in 2013, consisting of Press 106, Press 107, and Press 108, with maximum capacities of 117.75, 117.75, and 118.28 pounds per hour, respectively and exhausting to Vent #4.
- (c) One adhesive spray area used for coating fiberglass parts, identified as spray area #1, constructed in 2005 and modified in 2013, consisting of six (6) Binks HVLP spray guns, with a combined maximum capacity of 2.81 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (d) One adhesive spray area used for coating fiberglass parts, identified as spray area #2, constructed in 2005, and modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray guns, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #2.
- (e) One adhesive spray area used for coating fiberglass parts, identified as spray area #3, constructed in 2005, and modified in 2013, consisting of one (1) Binks HVLP spray gun, with a maximum capacity of 0.47 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (f) One adhesive spray area used for coating fiberglass parts, identified as spray area #4, constructed in 2005 and modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray gun, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.

- (g) One adhesive spray area used for coating fiberglass parts, identified as spray area #5, constructed in 2011, and modified in 2013, consisting of one (1) Binks HVLP spray gun and one (1) Graco airless spray gun, with a combined maximum capacity of 5.33 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
  
- (h) One adhesive spray area used for coating fiberglass parts, identified as spray area #6, approved for construction in 2013, consisting of four (4) Walther HVLP spray gun with a combined maximum capacity of 2.02 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #4.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M003-31245-00343, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification 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.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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.

The Permittee shall implement the PMPs.
- (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 Permittee shall implement the PMPs.

- (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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M003-31245-00343 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) 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.18 Credible Evidence [326 IAC 1-1-6]**

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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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.3 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.4 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.5 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.6 Fugitive Dust Emissions [326 IAC 6-4]**

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

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

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

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition starts 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.

- (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 2-6.1-5(a)(2)]**

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

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

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

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

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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.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) 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.
- (c) 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) molding operation, constructed in 2002, consisting of Press 101, Press 102, Press 103, Press 104, and Press 105, with maximum capacities of 121.6, 156.1, 115.4, 104.1, and 28.9 pounds per hour, respectively and exhausting to the Vent #2.
- (b) One (1) molding operation approved for construction in 2013, consisting of Press 106, Press 107, and Press 108, with maximum capacities of 117.75, 117.75, and 118.28 pounds per hour, respectively and exhausting to Vent #4.
- (c) One adhesive spray area used for coating fiberglass parts, identified as spray area #1, constructed in 2005 and modified in 2013, consisting of six (6) Binks HVLP spray guns, with a combined maximum capacity of 2.81 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (d) One adhesive spray area used for coating fiberglass parts, identified as spray area #2, constructed in 2005, and modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray guns, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #2.
- (e) One adhesive spray area used for coating fiberglass parts, identified as spray area #3, constructed in 2005, and modified in 2013, consisting of one (1) Binks HVLP spray gun, with a maximum capacity of 0.47 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (f) One adhesive spray area used for coating fiberglass parts, identified as spray area #4, constructed in 2005 and modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray gun, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
- (g) One adhesive spray area used for coating fiberglass parts, identified as spray area #5, constructed in 2011, and modified in 2013, consisting of one (1) Binks HVLP spray gun and one (1) Graco airless spray gun, with a combined maximum capacity of 5.33 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
- (h) One adhesive spray area used for coating fiberglass parts, identified as spray area #6, approved for construction in 2013, consisting of four (4) Walther HVLP spray gun with a combined maximum capacity of 2.02 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #4.

(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 2-6.1-5(a)(1)]

#### D.1.1 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the six (6) adhesive spray areas shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

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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.

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

**D.1.3 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with D.1.1.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	Insul-Coustic Corporation
<b>Address:</b>	2701 South Coliseum Boulevard
<b>City:</b>	Fort Wayne, Indiana 46803
<b>Phone #:</b>	(260) 420-1480
<b>MSOP #:</b>	M003-31245-00343

I hereby certify that Insul-Coustic Corporation is:

still in operation.

I hereby certify that Insul-Coustic Corporation is:

no longer in operation.

in compliance with the requirements of MSOP M003-31245-00343.

not in compliance with the requirements of MSOP M003-31245-00343.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Administrative Amendment to a Minor Source Operating Permit (MSOP)

#### Source Description and Location

<b>Source Name:</b>	<b>Insul-Coustic Corporation</b>
<b>Source Location:</b>	<b>2701 South Coliseum Boulevard, Fort Wayne, IN 46803</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>3296 (Mineral Wool)</b>
<b>Operation Permit No.:</b>	<b>M003-31245-00343</b>
<b>Operation Permit Issuance Date:</b>	<b>April 19, 2012</b>
<b>Administrative Amendment No.:</b>	<b>003-33263-00343</b>
<b>Permit Reviewer:</b>	<b>Muhammad D. Khan</b>

On May 31, 2013, the Office of Air Quality (OAQ) received an application from Insul-Coustic Corporation related to a modification to an existing emission unit and construction of new emission units.

#### Existing Approvals

Since the issuance of the MSOP No. 003-31245-00343 on April 19, 2012, the source did not receive any additional approvals.

#### County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Allen County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Indiana has three years from the

publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

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

**Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

**Status of the Existing Source**

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Spray Area #1	22.4	22.48	22.48	0	0	0	0	0	0	0
Spray Area #2	4.99	4.99	4.99	0	0	0	0	0	0	0
Spray Area #3	1.84	1.84	1.84	0	0	0.18	0	0	0.17	0.17 (Vinyl Acetate)
Spray Area #4	6.87	6.87	6.87	0	0	0	0	0	0	0
Spray Area #5	40.6	40.68	40.68	0	0	8.42	0	0	0.33	0.33 (Ethylene Glycol)
Press Molding Operation	0	0	0	0	0	13.93	0	0	9.78	6.82 (Phenol)
<b>Total PTE of Entire Source</b>	<b>76.8</b>	<b>76.86</b>	<b>76.86</b>	<b>0</b>	<b>0</b>	<b>22.53</b>	<b>0</b>	<b>0</b>	<b>10.28</b>	<b>6.82 (Phenol)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

These emissions are based upon MSOP 003-31245-00343 issued April 19, 2012.

<b>Description of Proposed Revision</b>
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The Office of Air Quality (OAQ) has reviewed an application, submitted by Insul-Coustic Corp on May 31, 2013, relating to the following construction of new units and modification of existing units.

(a) Modification of the following existing units:

- (1) One (1) molding operation, constructed in 2002, consisting of Press 101, Press 102, Press 103, Press 104, and Press 105, with maximum capacities of 121.6, 156.1, 115.4, 104.1, and 28.9 pounds per hour, respectively and exhausting to the Vent #2.
- (2) One adhesive spray area used for coating fiberglass parts, identified as spray area #1, constructed in 2005 to be modified in 2013, consisting of six (6) Binks HVLP spray guns, with a combined maximum capacity of 2.81 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (3) One adhesive spray area used for coating fiberglass parts, identified as spray area #2, constructed in 2005, to be modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray guns, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #2.
- (4) One adhesive spray area used for coating fiberglass parts, identified as spray area #3, constructed in 2005, and to be modified in 2013, consisting of one (1) Binks HVLP spray gun, with a maximum capacity of 0.47 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (5) One adhesive spray area used for coating fiberglass parts, identified as spray area #4, constructed in 2005 and to be modified in 2013, consisting of one (1) Binks and one (1) Walther HVLP spray gun, with a combined maximum capacity of 0.97 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
- (6) One adhesive spray area used for coating fiberglass parts, identified as spray area #5, constructed in 2011, and to be modified in 2013, consisting of one (1) Binks HVLP spray gun and one (1) Graco airless spray gun, with a combined maximum capacity of 5.33 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.

(b) Construction of the following new proposed emission units:

- (1) One (1) molding operation approved for construction in 2013, consisting of Press 106, Press 107, and Press 108, with maximum capacities of 117.75, 117.75, and 118.28 pounds per hour, respectively and exhausting to Vent #4.
- (2) One adhesive spray area used for coating fiberglass parts, identified as spray area #6, approved for construction in 2013, consisting of four (4) Walther HVLP spray gun with a combined maximum capacity of 2.02 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #4.

The construction and operation of the above new and modified equipments are of the same type as the other permitted molding operation and adhesive spray area. The new equipment will comply with the same applicable requirements and permit terms and conditions as the other similar equipment, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. The addition of the new equipment to the permit is considered an administrative amendment

pursuant to 326 IAC 2-6.1-6(d)(2), 326 IAC 2-6.1-6(d)(6) and 326 IAC 2-6.1-6(d)(8).

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**PTE of the Entire Source After Issuance of the MSOP Administrative Amendment**

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Spray Area #1	<del>22.4</del> <b>14.98</b>	<del>22.4</del> <b>14.98</b>	<del>22.4</del> <b>14.98</b>	0	0	0	0	0	0	0
Spray Area #2	<del>4.99</del> <b>5.17</b>	<del>4.99</del> <b>5.17</b>	<del>4.99</del> <b>5.17</b>	0	0	0	0	0	0	0
Spray Area #3	<del>1.84</del> <b>4.48</b>	<del>1.84</del> <b>4.48</b>	<del>1.84</del> <b>4.48</b>	0	0	<del>0.18</del>	0	0	<del>0.17</del>	<del>0.17</del> (Vinyl Acetate)
Spray Area #4	<del>6.87</del> <b>5.17</b>	<del>6.87</del> <b>5.17</b>	<del>6.87</del> <b>5.17</b>	0	0	0	0	0	0	0
Spray Area #5	<del>40.68</del> <b>39.66</b>	<del>40.68</del> <b>39.66</b>	<del>40.68</del> <b>39.66</b>	0	0	<del>8.42</del> <b>3.69</b>	0	0	0.33	0.33 (Ethylene Glycol)
<b>Spray Area #6</b>	<b>10.77</b>	<b>10.77</b>	<b>10.77</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Press Molding Operation (Press #101, 102, 103, 104 & 105)	0	0	0	0	0	<del>13.93</del> <b>10.83</b>	0	0	<del>9.78</del> <b>7.60</b>	<del>6.82</del> <b>5.30</b> (Phenol)
<b>Press Molding Operation (Press #106, 107 &amp; 108)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7.28</b>	<b>0</b>	<b>0</b>	<b>5.11</b>	<b>3.56</b> (Phenol)
Total PTE of Entire Source	<del>76.86</del> <b>80.23</b>	<del>76.86</del> <b>80.23</b>	<del>76.86</del> <b>80.23</b>	0	0	<del>22.52</del> <b>21.8</b>	0	0	<del>40.28</del> <b>13.05</b>	<del>6.82</del> <b>8.86</b> (Phenol)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	10	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for CO<sub>2</sub>e in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Spray Area #1	14.98	14.98	14.98	0	0	0	0	0	0	0
Spray Area #2	5.17	5.17	5.17	0	0	0	0	0	0	0
Spray Area #3	4.48	4.48	4.48	0	0	0	0	0	0	0
Spray Area #4	5.17	5.17	5.17	0	0	0	0	0	0	0
Spray Area #5	39.66	39.66	39.66	0	0	3.69	0	0	0.33	0.33 (Ethylene Glycol)
Spray Area #6	10.77	10.77	10.77	0	0	0	0	0	0	0.00
Press Molding Operation (Press #101, 102, 103, 104 & 105)	0	0	0	0	0	10.83	0	0	7.60	5.30 (Phenol)
Press Molding Operation (Press #106, 107 & 108)	0	0	0	0	0	7.28	0	0	5.11	3.56 (Phenol)
<b>Total PTE of Entire Source</b>	<b>80.23</b>	<b>80.23</b>	<b>80.23</b>	<b>0</b>	<b>0</b>	<b>21.80</b>	<b>0</b>	<b>0</b>	<b>13.05</b>	<b>8.86 (Phenol)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	10	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for CO <sub>2</sub> e in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

#### MSOP Status

- (a) This revision to an existing minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source is less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

<b>Federal Rule Applicability Determination</b>
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#### **New Source Performance Standards (NSPS)**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed Notice Only Change.

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

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed Notice Only Change.

#### **Compliance Assurance Monitoring (CAM)**

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the proposed Notice Only Change:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the MSOP status above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new and modified units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

### **Molding Operation**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3-2 do not apply to the two (2) molding operations because they do not have the potential to emit particulate matter.
- (b) The two (2) molding operations are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the molding operation is less than twenty-five (25) tons per year.
- (c) There are no other 326 IAC 8 Rules that are applicable to the molding operations.

### **Adhesive Spray Areas**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(d), the particulate from the five (6) adhesive spray areas, identified as spray areas #1 through #6, shall be controlled by particulate filters, water wash, or an equivalent control device, and subject to the following:
  - (1) The source shall operate each control device in accordance with manufacturer's specifications.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    - (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) 326 IAC 8-1-6 (New facilities; general reduction requirements)  
The five (5) adhesive spray areas, identified as spray areas #1 through #5 are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each spray area is less than twenty-five (25) tons per year.
- (c) There are no other 326 IAC 8 Rules that are applicable to the five (5) adhesive spray areas.

### Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this Administrative Amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 003-31245-0343, issued on April 19, 2012.

### Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

#### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) molding operation, constructed in 2002, consisting of Press 101, Press 102, Press 103, Press 104, and Press 105, with maximum capacities of 121.6, 156.1, ~~428.2~~ **115.4**, ~~467.0~~ **104.1**, and ~~403.6~~ **28.9** pounds per hour, respectively and exhausting to the Vent #2.
- (b) **One (1) molding operation approved for construction in 2013, consisting of Press 106, Press 107, and Press 108, with maximum capacities of 117.75, 117.75, and 118.28 pounds per hour, respectively and exhausting to Vent #4.**
- (bc) One adhesive spray area used for coating fiberglass parts, identified as spray area #1, constructed in 2005 and modified in ~~2010~~ **2013**, consisting of ~~two six (26)~~ **one (1)** Binks and ~~four (4)~~ **one (1)** Walther HVLP spray guns, with a combined maximum capacity of ~~4.22~~ **2.81** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (cd) One adhesive spray area used for coating fiberglass parts, identified as spray area #2, constructed in 2005, **and modified in 2013**, consisting of ~~two one (21)~~ **one (1)** Binks **and one (1)** Walther HVLP spray guns, with a combined maximum capacity of ~~0.94~~ **0.97** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #~~2~~ **1**.
- (de) One adhesive spray area used for coating fiberglass parts, identified as spray area #3, constructed in 2005, **and modified in 2013**, consisting of one (1) Binks HVLP spray gun, with a maximum capacity of 0.47 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (ef) One adhesive spray area used for coating fiberglass parts, identified as spray area #4, constructed in 2005 and modified in ~~2010~~ **2013**, consisting of one (1) Binks and one (1) Walther HVLP spray gun, with a combined maximum capacity of ~~4.29~~ **0.97** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #~~2~~ **3**.

- (fg) One adhesive spray area used for coating fiberglass parts, identified as spray area #5, constructed in 2011, **modified in 2013**, consisting of one (1) Binks HVLP spray gun and one (1) Graco airless spray gun, with a combined maximum capacity of 5.33 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
- (h) **One adhesive spray area used for coating fiberglass parts, identified as spray area #6, approved for construction in 2013, consisting of four (4) Walther HVLP spray gun with a combined maximum capacity of 2.02 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #4.**

\*\*\*\*\*

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) molding operation, constructed in 2002, consisting of Press 101, Press 102, Press 103, Press 104, and Press 105, with maximum capacities of 121.6, 156.1, ~~428.2~~ **115.4**, ~~467.0~~ **104.1**, and ~~403.6~~ **28.9** pounds per hour, respectively and exhausting to the Vent #2.
- (b) **One (1) molding operation approved for construction in 2013, consisting of Press 106, Press 107, and Press 108, with maximum capacities of 117.75, 117.75, and 118.28 pounds per hour, respectively and exhausting to Vent #4.**
- (bc) One adhesive spray area used for coating fiberglass parts, identified as spray area #1, constructed in 2005 and modified in ~~2010~~ **2013**, consisting of ~~two six (26)~~ **two six (26)** Binks and ~~four (4)~~ **two (2)** Walther HVLP spray guns, with a combined maximum capacity of ~~4.22~~ **2.81** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (cd) One adhesive spray area used for coating fiberglass parts, identified as spray area #2, constructed in 2005, **and modified in 2013**, consisting of ~~two one (21)~~ **two one (21)** Binks and **one (1)** Walther HVLP spray guns, with a combined maximum capacity of ~~0.94~~ **0.97** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #12.
- (de) One adhesive spray area used for coating fiberglass parts, identified as spray area #3, constructed in 2005, , **and modified in 2013**, consisting of one (1) Binks HVLP spray gun, with a maximum capacity of 0.47 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #1.
- (ef) One adhesive spray area used for coating fiberglass parts, identified as spray area #4, constructed in 2005 and modified in ~~2010~~ **2013**, consisting of one (1) Binks and one (1) Walther HVLP spray gun, with a combined maximum capacity of ~~4.29~~ **0.97** gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #23.
- (fg) One adhesive spray area used for coating fiberglass parts, identified as spray area #5, constructed in 2011, **modified in 2013**, consisting of one (1) Binks HVLP spray gun and one (1) Graco airless spray gun, with a combined maximum capacity of 5.33 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #3.
- (h) **One adhesive spray area used for coating fiberglass parts, identified as spray area #6, approved for construction in 2013, consisting of four (4) Walther HVLP spray gun with a combined maximum capacity of 2.02 gallons of adhesive per hour, using dry filters as overspray control, and exhausting to Vent #4.**

(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 2-6.1-5(a)(1)]**

#### **D.1.1 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the ~~five~~ **six (56)** adhesive spray areas shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 31, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No. 003-33263-00343. The staff recommends to the Commissioner that this MSOP Administrative Amendment be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Muhammad D. Khan 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) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.
- (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.in.gov/idem](http://www.in.gov/idem)

Appendix A: Emissions Calculations

Summary of Emissions

Company Name: Insul-Coustic Corporation  
 Address City IN Zip: 2701 S. Coliseum Blvd., Fort Wayne, IN 46803  
 Permit Number: 003-33263-00343  
 Reviewer: Muhammad D. Khan

Unlimited Potential to Emit (tons/year)											
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single HAP	
Spray Area #1	14.98	14.98	14.98	0	0	0	0	0	0	0	-
Spray Area #2	5.17	5.17	5.17	0	0	0	0	0	0	0	-
Spray Area #3	4.48	4.48	4.48	0	0	0	0	0	0	0.00	-
Spray Area #4	5.17	5.17	5.17	0	0	0	0	0	0	0	-
Spray Area #5	39.66	39.66	39.66	0	0	3.69	0	0	0.33	0.33	Ethylene Glycol
<b>Spray Area #6</b>	<b>10.77</b>	<b>10.77</b>	<b>10.77</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>-</b>
Press Molding Operation (Press #101, 102, 103, 104 & 105)	0	0	0	0	0	10.83	0	0	7.60	5.30	Phenol
<b>Press Molding Operation (Press #106, 107 &amp; 108)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7.28</b>	<b>0</b>	<b>0</b>	<b>5.11</b>	<b>3.56</b>	<b>Phenol</b>
<b>Total</b>	<b>80.23</b>	<b>80.23</b>	<b>80.23</b>	<b>0</b>	<b>0</b>	<b>21.80</b>	<b>0</b>	<b>0</b>	<b>13.05</b>	<b>8.86</b>	<b>Phenol</b>

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Insul-Coustic Corporation  
Address City IN Zip: 2701 S. Coliseum Blvd., Fort Wayne, IN 46803  
Permit Number: 003-33263-00343  
Reviewer: Muhammad D. Khan**

Existing and Modified Units:

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)*	Maximum (unit/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
<b>Spray Area #1</b>															
Simalfa - Six (6) Binks HVLP Spray Guns	8.85	45.00%	45.0%	0.0%	0.0%	0.0%	2.81	1.00	0.00	0.00	0.00	0.00	0.00	14.98	75%
<b>Spray Area #2</b>															
Simalfa - One (1) Walther HVLP Spray Guns	8.85	45.00%	45.0%	0.0%	0.0%	0.0%	0.51	1.00	0.00	0.00	0.00	0.00	0.00	2.72	75%
Simalfa - One (1) Binks HVLP Spray Guns	8.85	45.00%	45.0%	0.0%	0.0%	0.0%	0.46	1.00	0.00	0.00	0.00	0.00	0.00	2.45	75%
<b>Spray Area #3</b>															
PSA-D-142 - One (1) Binks HVLP Spray Gun	8.75	0.15%	0.2%	0.00%	0.0%	0.0%	0.47	1.00	0.00	0.00	0.00	0.00	0.00	4.48	75%
<b>Spray Area #4</b>															
Simalfa - One (1) Walther HVLP Spray Gun	8.85	45.00%	45.0%	0.0%	0.0%	0.0%	0.51	1.00	0.00	0.00	0.00	0.00	0.00	2.72	75%
Simalfa - One (1) Binks HVLP Spray Gun	8.85	45.00%	45.0%	0.0%	0.0%	0.0%	0.46	1.00	0.00	0.00	0.00	0.00	0.00	2.45	75%
<b>Spray Area #5</b>															
1102 Monoco Acrylic Coating - One (1) Binks HVLP Spray Gun	11.40	53.00%	48.3%	4.70%	0.0%	0.0%	0.47	1.00	0.54	0.54	0.25	6.03	1.10	2.75	75%
Sandstorm B983 Nitrile Coating Mixture - One (1) Graco Airless Spray Gun	12.16	43.00%	42.0%	1.00%	0.0%	0.0%	4.86	1.00	0.12	0.12	0.59	14.19	2.59	36.91	75%

**PTE of modified Units:**

**0.84      20.22      3.69      69.46**

**New Emission Units**

<b>Spray Area #6</b>															
Simalfa -Four (4) Walther HVLP Spray Gun	8.85	45.00%	45.0%	0.00%	0.0%	0.0%	2.02	1.00	0.00	0.00	0.00	0.00	0.00	10.77	75%

**PTE after modification**

**0.84      20.22      3.69      80.23**

**METHODOLOGY**

\* The maximum gallons of material applied per unit is based on information provided by the manufacturer of the spray guns. In addition, the sources estimates the maximum spraying time per part is 25% of the total time of operation (i.e. 15 minutes per hour, since the maximum units coated per hour is one). Material is spray-applied to surfaces, surfaces placed together, edges folded and cut. This methodology was used in the initial MSOP issued to this source.

Gal of Material per hour for HVLP Spray Guns = Maximum Flow Rate (oz/min) \* 60 (min/hr) \* 1/128 (gal/oz) \* 25% \* Number of Spray Guns in each Spray Area

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

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

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

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

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

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

Note the only cleanup solvent used at this source is acetone, which is a non VOC (exempt) and HAP containing solvent.

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Insul-Coustic Corporation  
**Address City IN Zip:** 2701 S. Coliseum Blvd., Fort Wayne, IN 46803  
**Permit Number:** 003-33263-00343  
**Permit Reviewer:** Muhammad D. Khan

Material*	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Vinyl Acetate	Weight % Ethylene Glycol	Vinyl Acetate Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)
<b>Spray Area #3</b>							
PSA-D-142 - One (1) Binks HVLP Spray Gun	8.75	0.47	1.000	0.00%	0.00%	0.00	0.00
<b>Spray Area #5</b>							
1102 Moneco Acrylic Coating - One (1) Binks HVLP Spray Gun	11.4	0.47	1.000	0.00%	1.40%	0.00	0.33

Total Potential Emissions **0.00**                      **0.33**

**METHODOLOGY**

\* IDEM has reviewed the MSDS for each coating and confirmed that Simalfa and the Sandstrom B983 Nitrile Coating Mixture, which are used in Spray Areas #1, #2, #3 and #4 do not contain any HAPs.

HAPs emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and HAPs  
From Press Molding Operations**

**Company Name: Insul-Coustic Corporation  
Address City IN Zip: 2701 S. Coliseum Blvd., Fort Wayne, IN 46803  
Permit Number: 003-33263-00343  
Reviewer: Muhammad D. Khan**

**Emission Factors for the Uncured Fiberglass Parts (lbs/lb material processed)\***

Formaldehyde	0.001
Phenol	0.0023
Ammonia	0.0014

**Existing Modified emission Units:**

Press Number	Maximum Rate (lb/hr)	Potential Emissions					
		Pounds of Formaldehyde per hour	Pounds of Phenol per hour	Pounds of Ammonia per hour	Tons of VOC per year	Tons of Formaldehyde per year**	Tons of Phenol per year**
Press 101	121.6	0.12	0.28	0.17024	2.50	0.53	1.22
Press 102	156.1	0.16	0.36	0.21854	3.21	0.68	1.57
Press 103	115.4	0.12	0.27	0.16156	2.38	0.51	1.16
Press 104	104.1	0.10	0.24	0.14574	2.14	0.46	1.05
Press 105	28.9	0.03	0.07	0.04046	0.59	0.13	0.29

<b>Total PTE of Modified units (tons/year) =</b>	<b>10.83</b>	<b>2.30</b>	<b>5.30</b>
		<b>Total HAP (tons/year) from Press 101, 102, 103, 104 and 105 =</b>	
			<b>7.60</b>

**New Emissions Units Constructed in 2013:**

Press Number	Maximum Rate (lb/hr)	Potential Emissions					
		Pounds of Formaldehyde per hour	Pounds of Phenol per hour	Pounds of Ammonia per hour	Tons of VOC per year	Tons of Formaldehyde per year**	Tons of Phenol per year**
Press 106	117.75	0.12	0.27	0.16	2.42	0.52	1.19
Press 107	117.75	0.12	0.27	0.16	2.42	0.52	1.19
Press 108	118.28	0.12	0.27	0.17	2.43	0.52	1.19

<b>Total PTE of New units (tons/year) =</b>	<b>7.28</b>	<b>1.55</b>	<b>3.56</b>
		<b>Total HAP from Press 106, 107 and 108</b>	
			<b>5.11</b>

<b>Total PTE (tons/year)</b>	<b>18.11</b>	<b>3.85</b>	<b>8.86</b>
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<b>Total HAP (tons/year) =</b>	<b>12.72</b>
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**METHODOLOGY**

Potential Formaldehyde Pounds per Hour = Emission Factor (lb/lbs material processed) \* Rate (lb/hr)  
 Potential Phenol Pounds per Hour = Emission Factor (lb/lbs material processed) \* Rate (lb/hr)  
 Potential Ammonia Pounds per Hour = Emission Factor (lb/lbs material processed) \* Rate (lb/hr)  
 Total Potential VOC Tons per Year = Sum of all pollutants (lb/hr) \* (8760 hrs/yr) \* (1 ton /2000 lbs)  
 Total Potential Formaldehyde Tons per Year = Potential Formaldehyde (lb/hr) \* (8760 hrs/yr) \* (1 ton /2000 lbs)  
 Total Potential Phenol Tons per Year = Potential Phenol (lb/hr) \* (8760 hrs/yr) \* (1 ton /2000 lbs)

\*The emission factors are the amount of VOC and HAPs in the uncured fiberglass parts per the MSDS.

\*\* Under the Clean Air Act, formaldehyde and phenol are considered HAPs.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** W. Kirk Cunningham  
Insul-Coustic Corporation  
2701 South Coliseum Boulevard, Suite 1286  
Fort Wayne, IN 46803

**DATE:** June 18, 2013

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

**SUBJECT:** Final Decision  
Administrative Amendment  
003-33263-00343

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Larry Reynolds – SES Environmental, Inc.  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 6/18/2013 Insul-Coustic Corp 003-33263-00343 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		W Kirk Cunningham Insul-Coustic Corp 2701 S Coliseum Blvd, Ste 1286 Fort Wayne IN 46803 (Source CAATS) via confirmed delivery										
2		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
3		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
4		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
5		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
6		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
7		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
8		Mr. Larry Reynolds SES Environmental Inc 3807 Transportation Dr Fort Wayne IN 46818 (Consultant)										
9												
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<b>7</b>			