



# 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

To: Interested Parties

Date: July 29, 2014

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

Source Name: Tower Structural Laminating

Permit Level: Title V – Significant Permit Modification

Permit Number: 113-34354-00049

Source Location: 1491 Gerber Street and 1493 Gerber Street, Ligonier, Indiana

Type of Action Taken: Modification at an existing source  
Revisions to permit requirements  
Changes that are administrative in nature

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 34354.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

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

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



# 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

Heather Johnson  
Tower Structural Laminating  
PO Box 463  
Goshen, IN 46527

July 29, 2014

Re: 113-34354-00049  
Significant Permit Modification to  
Part 70 Renewal No.: T113-31469-00049

Dear Ms. Johnson:

Tower Structural Laminating was issued a Part 70 Operating Permit Renewal No. 113-31469-00049 on September 19, 2012 for a stationary fiberglass reinforced plywood panel manufacturing plant located at 1491 and 1493 Gerber Street, Ligonier, Indiana 46767. An application requesting changes to this permit was received on March 27, 2014. 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.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR Part 63, Subpart WWWW—National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

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 Ryan Graunke, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Ryan Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachment(s): Updated Permit, Technical Support Document and Appendix A

SC/REG

cc: File - Noble County  
Noble County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section  
IDEM Northern Regional Office



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Tower Structural Laminating  
1491 Gerber Street and 1493 Gerber Street  
Ligonier, Indiana 46767**

(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.

**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.

Operation Permit No.: T113-31469-00049	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 19, 2012  Expiration Date: September 19, 2017

Significant Permit Modification No.: 113-34354-00049	
Issued by:  Iryn Calilung Section Chief, Permits Branch Office of Air Quality	Issuance Date: July 29, 2014  Expiration Date: September 19, 2017

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>5</b>
A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]	
A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.5 Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>8</b>
B.1 Definitions [326 IAC 2-7-1]	
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)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10] [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]	
B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.20 Source Modification Requirement [326 IAC 2-7-10.5]	
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]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>19</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Stack Height [326 IAC 1-7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.8 Performance Testing [326 IAC 3-6]	

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

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

**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]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

**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]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

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

**D.1. FACILITY OPERATION CONDITIONS ..... 26**

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

- D.1.1 PSD Minor Limit [326 IAC 2-2]
- D.1.2 VOC Emissions [326 IAC 8-1-6]
- D.1.3 Plastics Composites Production [326 IAC 20-56]
- D.1.4 Particulate [326 IAC 6-3-2(d)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

**Compliance Determination Requirements**

- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

**D.2. FACILITY OPERATION CONDITIONS ..... 32**

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

- D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(J)(xxx)]

**Compliance Determination Requirements**

- D.2.2 Particulate Control [326 IAC 2-7-6(6)] [326 IAC 2-7-1(21)(J)(xxx)(DD)]
- D.2.3 Broken or Failed Bag Detection - Single Compartment Baghouse

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

- D.2.4 Visible Emissions Notations [326 IAC 2-7-1(21)(J)(xxx)(EE)]
- D.2.5 Baghouse Inspections [326 IAC 2-7-1(21)(J)(xxx)(FF)]
- D.2.6 Broken or Failed Bag Detection - Multi-Compartment Baghouse
- D.2.7 Cyclone Inspections [326 IAC 2-7-1(21)(J)(xxx)(FF)]
- D.2.8 Cyclone Failure Detection

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

D.2.9 Record Keeping Requirements [326 IAC 2-7-1(21)(J)(xxx)(GG)]

**E.1. FACILITY OPERATION CONDITIONS ..... 35**

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

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

**Certification ..... 37**

**Emergency Occurrence Report ..... 39**

**Quarterly Report..... 40**

**Attachment A:** 40 CFR Part 63, Subpart WWWW—National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary fiberglass reinforced plywood panel manufacturing plant.

Source Address:	1491 and 1493 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	(574) 642-4888
SIC Code	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

This stationary fiberglass reinforced plywood panel manufacturing source consists of two (2) plants:

- (a) Plant 1 is located at 1491 Gerber Street, Ligonier, Indiana; and
- (b) Plant 2 is located at 1493 Gerber Street, Ligonier, Indiana.

These two (2) plants are located on one or more contiguous or adjacent properties, have the same two digit SIC code, and are under common control of the same entity. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under Part 70 Operating Permit Renewal No. T113-19369-00049 on December 11, 2007.

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

---

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

- (a) One (1) continuous lamination machine, identified as SV1-1, constructed in 1996, with a maximum capacity of 86 parts per hour, with no control equipment and exhausting at one (1) stack, identified as SV1.

Under 40 CFR 63, Subpart WWWW, this facility is considered a continuous lamination operation.

This equipment is located at plant 1.

- (b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.

- (c) One (1) Fluid Impingement Technology (FIT) gel coat application system attached to the Continuous Lamination Machine SV1-1, identified as SV1-4, constructed in 2000, with a maximum capacity to apply 330.83 pounds of gel coating per hour, with no control equipment and exhausting at one (1) stack, identified as SV1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation.

This equipment is located at plant 1.

- (d) One (1) gel coat storage tank, constructed in 2000, with a maximum capacity of 4,000 gallons.

Under 40 CFR 63, Subpart WWWW, this tank is considered a HAP-containing material storage container.

This equipment is located at plant 1.

- (e) One (1) gel coat booth, identified as GB1, constructed in 2006, equipped with air assisted airless application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as GB1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation.

This equipment is located at plant 2.

- (f) One (1) resin application booth, identified as RB1, constructed in 2006, equipped with non-atomizing application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as RB1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding operation.

This equipment is located at plant 2.

- (g) One (1) Fluid Impingement Technology (FIT) gel coat application system attached to the Continuous Lamination Machine SV1-1, constructed in 2007, identified as SV1-4-B, with a maximum capacity to apply 330.83 pounds of gel coating per hour, no particulate control equipment, no external exhaust.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

This equipment will be located at plant 1.

- (h) One (1) gel coat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through a stack S-3, and used to perform the following operations:
  - (i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.
  - (ii) Gel coat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method or Resin application, using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.
  - (iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.
  - (iv) Mold cleaning using acetone.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

This equipment will be located at plant 1.

- (i) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing tanks.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(14)]

---

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Woodworking operations consisting of one (1) plywood cutting operation and one (1) fiberglass reinforced plywood panel cutting operation, constructed in 1996, maximum capacity of 6,000 pounds per hour, controlled by two (2) cyclones and a two (2) baghouses (DC1 and DC2) in series, design grain loading of one one-thousandths (0.001) grains per actual cubic foot, and a gas flow rate of twenty-eight thousand nine hundred (28,900) actual cubic feet per minute. This equipment is located in plant 1. [326 IAC 2-7-1(21)(J)(xxx)]

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

---

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

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

## **SECTION B GENERAL CONDITIONS**

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

---

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

### **B.2 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, T113-31469-00049, 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:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
  - (2) 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(35).

**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 July 1 of each year to:

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

and

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

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

The submittal by the Permittee does require 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(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [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.

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 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(35).

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. 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(35).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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)(8) 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 T113-31469-00049 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(35).

- (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(35).

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]**

---

(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(35).

(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) or (c) 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)(1) and (c)(1). 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) and (c)(1).

- (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 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(35).

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

**B.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(35).

- (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 Stack Height [326 IAC 1-7]

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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) 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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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)]**

---

- (a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

- (b) For existing units:

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 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 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(35).

**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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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(35).

**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]**

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

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

The statement must be submitted to:

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

The emission statement does require 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(35).

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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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(35). 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

---

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

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

- (a) One (1) continuous lamination machine, identified as SV1-1, constructed in 1996, with a maximum capacity of 86 parts per hour, with no control equipment and exhausting at one (1) stack, identified as SV1.

Under 40 CFR 63, Subpart WWWW, this facility is considered a continuous lamination operation.

This equipment is located at plant 1.

- (b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.

- (c) One (1) Fluid Impingement Technology (FIT) gel coat application system attached to the Continuous Lamination Machine SV1-1, identified as SV1-4, constructed in 2000, with a maximum capacity to apply 330.83 pounds of gel coating per hour, with no control equipment and exhausting at one (1) stack, identified as SV1. Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation. This equipment is located at plant 1.

- (d) One (1) gel coat storage tank, constructed in 2000, with a maximum capacity of 4,000 gallons. Under 40 CFR 63, Subpart WWWW, this tank is considered a HAP-containing material storage container. This equipment is located at plant 1.

- (e) One (1) gel coat booth, identified as GB1, constructed in 2006, equipped with air assisted airless application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as GB1. Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation. This equipment is located at plant 2.

- (f) One (1) resin application booth, identified as RB1, constructed in 2006, equipped with non-atomizing application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as RB1. Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding operation. This equipment is located at plant 2.

- (g) One (1) Fluid Impingement Technology (FIT) gel coat application system attached to the Continuous Lamination Machine SV1-1, constructed in 2007, identified as SV1-4-B, with a maximum capacity to apply 330.83 pounds of gel coating per hour, no particulate control equipment, no external exhaust. Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation. This equipment will be located at plant 1.

- (h) One (1) gelcoat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through a stack S-3, used to perform the following operations:

- (i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.

<p>(ii) Gelcoat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method <u>OR</u> Resin application using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.</p> <p>(iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.</p> <p>(iv) Mold cleaning, using acetone.</p> <p>Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.</p> <p>This equipment will be located at plant 1.</p> <p>(i) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.</p> <p>Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing tanks.</p> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>
---

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

#### **D.1.1 PSD Minor Limit [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the use of resins and gel coats at the one (1) continuous lamination machine, identified as SV1-1, the one (1) fluid impingement technology gel coat application system, identified as SV1-4, the one (1) fluid impingement technology gel coat application system, identified as SV1-4-B, the one (1) gel coat booth identified as GB1, the one (1) resin application booth, identified as RB1, and the one (1) gel coat/resin reciprocator, identified as P1-RGR1, combined, shall be limited such that the potential to emit (PTE) of VOC shall be less than two hundred forty (240) tons per twelve (12) consecutive months with compliance determined at the end of each month.

#### **D.1.2 VOC Emissions [326 IAC 8-1-6]**

Pursuant to Significant Permit Modification No.113-28136-00049, issued on October 15, 2009, the VOC BACT for the one (1) continuous lamination machine, identified as SV1-1, shall be as specified in subsections (a) and (b) below:

- (a) Compliance with all applicable requirements of 40 CFR 63, Subpart WWWW, as specified in Section E.1.
- (b) Compliance with the following requirements of 326 IAC 20-56-2:
  - (1) 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:
    - (A) All personnel hired shall be trained within (30) days of hiring.
    - (B) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

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

#### D.1.3 Plastics Composites Production [326 IAC 20-56]

Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following operator training requirements:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
  - (1) All personnel hired shall be trained within thirty (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 paragraph (1) if written documentation that the employee's training is current is provided to the new employer.
- (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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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

---

Pursuant to 326 IAC 6-3-2(d), the particulate emissions from the gel coat booth, identified as GB1, and the resin application booth, identified as RB1, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### **Compliance Determination Requirements**

#### D.1.6 Volatile Organic Compounds (VOC)

---

Compliance with the limit in Condition D.1.1 shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained as described in D.1.6 (b) and (c) of this permit, the latest compliance stack test, or from a reference approved by IDEM, OAQ.
- (b) Emission factors shall be taken from the highest emission rates in the report on styrene testing conducted for this facility on October 21, 1998 and received by IDEM, OAQ on December 2, 1998. The highest styrene emission was 0.67% of styrene emitted per weight of styrene in resin applied. For the purposes of these emission calculations, monomer in resins that is not styrene or MMA shall be considered as styrene on an equivalent weight basis.
- (c) Emission factors shall be taken from the highest emission rates in the report on styrene and MMA testing conducted for this facility on June 14, 2001 and received by IDEM, OAQ on August 24, 2001. The highest methyl methacrylate (MMA) emission was 0.68% of MMA emitted per weight of MMA in gel coat applied, and the highest styrene emission was 0.19% of styrene emitted per weight of styrene in gel coat applied. For the purposes of these emission calculations, monomer in gel coats that is not MMA or styrene shall be considered as styrene on an equivalent weight basis.

- (d) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: " Unified Emission Factors for Open Molding of Composites," American Composites Manufacturers Association (ACMA), October 13, 2009. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or MMA shall be considered as styrene on an equivalent weight basis.

#### D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and 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.

Compliance with the Condition D.1.1 shall be determined using the following calculation:

$$\text{VOC emissions (tons/month)} = ((A * B * EF) / 2000)$$

Where: A = Density (lb /gal resin or gel coat)  
B = Gallons of resin or gel used per month  
EF = Source Specific Emission Factor (highest Flash Off %)  
(lb monomer emitted/lb monomer used)  
2000 = conversion factor (lbs/ton)

Where no emission testing is available for an emission unit, compliance with the Condition D.1.1 shall be determined using the following calculation:

$$\text{VOC emissions (tons/month)} = (((A * C) / 2000) * UEF) / 2000$$

Where: A = Density (lb /gal resin or gel)  
C = Gallons of resin or gel used per month  
UEF = Unified Emission Factor for Open Molding of Composites  
(lb monomer/ton resin or gel)  
2000 = conversion factor (lbs/ton)

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

##### D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters on the gel coat booth, identified as GB1, and the resin application booth, identified as RB1. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. Section C - Response to Excursions or 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 coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Section C - Response to Excursions or 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.1.9 Record Keeping Requirements**

---

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each resin, gel coat, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.2(b) and D.1.3, the Permittee shall maintain the following training records:
- (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document the compliance status with Condition D.1.8, 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.1.10 Reporting Requirements**

---

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements 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(35).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activities:

Woodworking operations consisting of one (1) plywood cutting operation and one (1) fiberglass reinforced plywood panel cutting operation, constructed in 1996, maximum capacity of 6,000 pounds per hour, controlled by two (2) cyclones and a two (2) baghouses (DC1 and DC2) in series, design grain loading of one one-thousandths (0.001) grains per actual cubic foot, and a gas flow rate of twenty-eight thousand nine hundred (28,900) actual cubic feet per minute. This equipment is located in plant 1. [326 IAC 2-7-1(21)(J)(xxx)]

(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 Baghouse Limitations [326 IAC 2-7-1(21)(J)(xxx)]

The woodworking operations controlled by baghouse DC1 shall be considered insignificant activities for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(J)(xxx), including the following:

- (a) The baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

### Compliance Determination Requirements

#### D.2.2 Particulate Control [326 IAC 2-7-6(6)] [326 IAC 2-7-1(21)(J)(xxx)(DD)]

In order to comply with Condition D.2.1, the cyclones and baghouse for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

#### D.2.3 Broken or Failed Bag Detection - Single Compartment Baghouse

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

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

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

### **D.2.4 Visible Emissions Notations [326 IAC 2-7-1(21)(J)(xxx)(EE)]**

---

- (a) Daily visible emission notations of the woodworking operations stack exhausts shall be performed during normal daylight operations in accordance with 40 CFR 60, Appendix A, Method 22 when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. Visible emission monitoring is optional when venting to the indoors.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or 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.

### **D.2.5 Baghouse Inspections [326 IAC 2-7-1(21)(J)(xxx)(FF)]**

---

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

### **D.2.6 Broken or Failed Bag Detection - Multi-Compartment Baghouse**

---

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **D.2.7 Cyclone Inspections [326 IAC 2-7-1(21)(J)(xxx)(FF)]**

---

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking and silo storage operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

### **D.2.8 Cyclone Failure Detection**

---

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

material in the woodworking shops. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

**D.2.9 Record Keeping Requirements [326 IAC 2-7-1(21)(J)(xxx)(GG)]**

---

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Conditions D.2.5 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.7 and the dates the vents are redirected indoors or to the atmosphere.
- (c) The Permittee shall maintain records of corrective actions to document the compliance status with 326 IAC 2-7-1(21)(J)(xxx)(GG)(dd).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION E.1

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) continuous lamination machine identified as SV1-1, constructed in 1996, with a maximum capacity of 86 parts per hour, with no control equipment and exhausting at one (1) stack, identified as SV1.

Under 40 CFR 63, Subpart WWWW, this facility is considered a continuous lamination operation.

This equipment is located at plant 1.

- (b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.

- (c) One (1) Fluid Impingement Technology (FIT) gel coat application system attached to the Continuous Lamination Machine SV1-1, identified as SV1-4, constructed in 2000, with a maximum capacity to apply 330.83 pounds of gel coating per hour, with no control equipment and exhausting at one (1) stack, identified as SV1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation.

This equipment is located at plant 1.

- (d) One (1) gel coat storage tank, constructed in 2000, with a maximum capacity of 4,000 gallons.

Under 40 CFR 63, Subpart WWWW, this tank is considered a HAP-containing material storage container.

This equipment is located at plant 1.

- (e) One (1) gel coat booth, identified as GB1, constructed in 2006, equipped with air assisted airless application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as GB1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding reinforced plastic composites production operation.

This equipment is located at plant 2.

- (f) One (1) resin application booth, identified as RB1, constructed in 2006, equipped with non-atomizing application guns, using dry filters for particulate control; exhausting to one (1) stack, identified as RB1.

Under 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding operation.

This equipment is located at plant 2.

- (g) One (1) Fluid Impingement Technology gel (FIT) coat application system attached to the

Continuous Lamination Machine SV1-1, constructed in 2007, identified as SV1-4-B, with a maximum capacity to apply 330.83 pounds of gel coating per hour, no particulate control equipment, no external exhaust.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

This equipment will be located at plant 1.

(h) One (1) gelcoat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through stack S-3, used to perform the following operations:

- (i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.
- (ii) Gelcoat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method OR Resin application using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.
- (iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.
- (iv) Mold cleaning, using acetone.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.

This equipment will be located at plant 1.

(i) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing tanks.

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

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

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

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

- (a) Pursuant to 40 CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production which are incorporated by reference as 326 IAC 20-56-1, for the units as specified above. A copy of this rule is included as Attachment A. This source is subject to the following requirements of 40 CFR Part 63, Subpart WWWW:

- (1) 49 CFR 63.5780
- (2) 40 CFR 63.5785(a)
- (3) 40 CFR 63.5790(a)-(c)
- (4) 40 CFR 63.5795(b)

- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805(a)(1), (a)(2), (b)
- (11) 40 CFR 63.5810(a)-(d)
- (12) 40 CFR 63.5820(a)
- (13) 40 CFR 63.5835(a) and (c)
- (14) 40 CFR 63.5840
- (15) 40 CFR 63.5860(a)
- (16) 40 CFR 63.5895(c) and (d)
- (17) 40 CFR 63.5900(a)(2) – (4)
- (18) 40 CFR 63.5900(b)
- (19) 40 CFR 63.5900(c)
- (20) 40 CFR 63.5905
- (21) 40 CFR 63.5910(a)
- (22) 40 CFR 63.5910(b)
- (23) 40 CFR 63.5910(c)(1) – (3), (5)
- (24) 40 CFR 63.5910(d)
- (25) 40 CFR 63.5910(g)
- (26) 40 CFR 63.5910(h)
- (27) 40 CFR 63.5910(i)
- (28) 40 CFR 63.5915(a)(1)
- (29) 40 CFR 63.5915(c)
- (30) 40 CFR 63.5915(d)
- (31) 40 CFR 63.5920
- (32) 40 CFR 63.5930
- (33) 40 CFR 63.5935
- (34) Tables 1, 2, 3, 4, 5, 7, 8, 9, 13,14, and 15 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (35) Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

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

Source Name: Tower Structural Laminating  
Source Address: 1491 and 1493 Gerber Street, Ligonier, Indiana 46767  
Part 70 Permit No.: T113-31469-00049

**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: Tower Structural Laminating  
Source Address: 1491 and 1493 Gerber Street, Ligonier, Indiana 46767  
Part 70 Permit No.: T113-31469-00049

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

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

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

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

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

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Tower Structural Laminating  
Source Address: 1491 and 1493 Gerber St, Ligonier, Indiana 46767  
Part 70 Permit No.: T113-31469-00049  
Facility: The one (1) continuous lamination machine, identified as SV1-1, the one (1) fluid impingement technology gel coat application system, identified as SV1-4, the one (1) fluid impingement technology gel coat application system, identified as SV1-4-B, the one (1) gel coat booth identified as GB1, the one (1) resin application booth, identified as RB1, and the one (1) gel coat/resin reciprocator, identified as P1-RGR1.  
Parameter: VOC Emissions  
Limit: Less than two hundred forty-five (240) tons combined per twelve (12) consecutive month period, with compliance determined at the end of each month. The Permittee shall calculate emissions using emission factors derived from stack tests or Unified Emission Factors.

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: \_\_\_\_\_

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

Source Name: Tower Structural Laminating  
Source Address: 1491 and 1493 Gerber Street, Ligonier, Indiana 46767  
Part 70 Permit No.: T113-31469-00049

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

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

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

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

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

**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:	Tower Structural Laminating
Source Location:	1491 and 1493 Gerber Street, Ligonier, Indiana 46767
County:	Noble
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.:	T113-31469-00049
Operation Permit Issuance Date:	September 19, 2012
Significant Permit Modification No.:	113-34354-00049
Permit Reviewer:	Ryan Graunke

**Source Definition**

This stationary fiberglass reinforced plywood panel manufacturing source consists of two (2) plants:

- (a) Plant 1 is located at 1491 Gerber Street, Ligonier, Indiana; and
- (b) Plant 2 is located at 1493 Gerber Street, Ligonier, Indiana.

These two (2) plants are located on one or more contiguous or adjacent properties, have the same two digit SIC code, and are under common control of the same entity. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under Part 70 Operating Permit Renewal No. T113-19369-00049 on December 11, 2007.

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T113-34354-00049 on September 19, 2012. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Noble County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<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 PM2.5.	

- (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. Noble 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>**  
 Noble 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. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Noble County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**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:

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	35.3
PM <sub>10</sub>	35.5
PM <sub>2.5</sub>	35.5
SO <sub>2</sub>	0.02
VOC	245.2
CO	3.36
NO <sub>x</sub>	4.00
GHGs as CO <sub>2</sub> e	4,827
<b>HAPs</b>	
Styrene	>10
Methyl Methacrylate	>10
Dimethyl Phthalate	>10
Hexane	<10
<b>Total</b>	<b>&gt;25</b>

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, emissions of GHGs are less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

- (b) These emissions are based upon Appendix A the TSD for Part 70 Operating Permit Renewal No. T113-34354-00049 on September 19, 201
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

<b>Description of Proposed Modification</b>
---

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Tower Structural Laminating on March 27, 2014, relating to the following:

- (a) Addition of two (2) existing, insignificant shear mixing tanks,
- (b) Addition of two (2) 5,500 gallon tanks gallon polyester resin storage tanks,
- (c) Removal of two (2) existing 6,000 gallon polyester resin storage tanks, and
- (d) construction of a new identical baghouse for controlling particulate emissions from the reinforced plastic composite panel cutting operation.

The following is a list of the proposed emission units and pollution control devices:

- (a) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.

These mixing tanks are considered affected units under 40 CFR 63, Subpart WWWW.

- (b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.

Under 40 CFR 63, Subpart WWWW, these tanks are considered HAP-containing material storage containers.

- (c) One (1) baghouse, identified as DC2, with a design grain loading of one one-thousandths (0.001) grains per actual cubic foot and a gas flow rate of twenty-eight thousand nine hundred (28,900) actual cubic feet per minute.

In addition to these new units, the source asked for the following modification to the permit:

- (a) Clarify Condition D.1.3 since training is not required for the mixing and storage operation.
- (b) Remove Condition D.2.1(c) because it is a duplicate of D.2.4(a) and there are not recordkeeping requirements in D.2.9 for the monitoring requirements in D.2.1(c).

<b>Enforcement Issues</b>
---------------------------

There are no pending enforcement actions.

<b>Emission Calculations</b>
------------------------------

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

**Permit Level Determination – Part 70**

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

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

<b>Increase in PTE Before Controls of the Modification*</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	2.56
PM <sub>10</sub>	2.56
PM <sub>2.5</sub>	2.56
SO <sub>2</sub>	-
VOC	7.06
CO	-
NO <sub>x</sub>	-
Single HAPs	7.06 - Styrene
Total HAPs	7.06

\* PTE of the (2) covered shear mixing tanks, (2) polyester resin storage tanks, and new baghouse.

Note: The baghouse controlling emissions from the cutting operation is specifically listed as an insignificant unit under 326 IAC 2-7-1(21)(J)(xxx). Therefore PTE after control is consider for permit level determination.

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

Approval to construct

These units are not subject to the source mofication requirements under 326 IAC 2-7-10.5 because the PTE of this modification is less than the thresholds specified in 325 IAC 2-7-10.5(e)(1) for Minor Source Modifications.

Approval to operate

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) because this modification requires a change to the PSD minor limit for the source.

**Permit Level Determination – PSD**

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

Process / Emission Unit	Potential to Emit (ton/yr)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs
Continuous laminator	-	-	-	-	-	240.0	-	-
Gel coat and resin booths	34.13	34.13	34.13	-	-		-	-
Reciprocator	-	-	-	-	-		-	-
Shear mix tanks	1.48	1.48	1.48	-	-	7.01	-	-
Panel cutting	2.17	2.17	2.17	-	-	-	-	-
Natural gas combustion	0.08	0.30	0.30	0.02	4.00	0.22	3.36	4,826
Tanks	-	-	-	-	-	0.06	-	-
<b>Total for Source</b>	<b>37.9</b>	<b>38.0</b>	<b>38.0</b>	<b>0.02</b>	<b>4.00</b>	<b>247.3</b>	<b>3.36</b>	<b>4,826</b>
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2e</sub>

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

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

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the entire source, the existing VOC limit has been lowered from 245 tons per year to 240 tons per year to accommodate the unlimited potential to emit of VOC from the shear mix tanks. This is a Title 1 change.

<b>Federal Rule Applicability Determination</b>
---

The following federal rules are applicable to the source due to this modification:

New Source Performance Standards (NSPS)

- (a) The requirements of the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) are not included in the permit for the insignificant resin storage tanks because they each have a capacity less than 75 cubic meter (m<sup>3</sup>).

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) This new shear mixing tanks and styrene storage tanks are subject to the NESHAP for Reinforced Plastics Composite Production (40 CFR Part 63, Subpart WWWW (4W)), which is incorporated by reference as 326 IAC 20-56, because this source manufactures reinforced plastics composite products.

The units subject to this rule include the following:

- (1) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors.
- (2) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each.

The source is subject to the following portions of NESHAP Subpart WWWW (4W):

- (1) 49 CFR 63.5780
- (2) 40 CFR 63.5785(a)
- (3) 40 CFR 63.5790(a)-(c)
- (4) 40 CFR 63.5795(b)
- (5) 40 CFR 63.5796

- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805(a)(1), (a)(2), (b)
- (11) 40 CFR 63.5810(a)-(d)
- (12) 40 CFR 63.5820(a)
- (13) 40 CFR 63.5835(a) and (c)
- (14) 40 CFR 63.5840
- (15) 40 CFR 63.5860(a)
- (16) 40 CFR 63.5895(c) and (d)
- (17) 40 CFR 63.5900(a)(2) – (4)
- (18) 40 CFR 63.5900(b)
- (19) 40 CFR 63.5900(c)
- (20) 40 CFR 63.5905
- (21) 40 CFR 63.5910(a)
- (22) 40 CFR 63.5910(b)
- (23) 40 CFR 63.5910(c)(1) – (3), (5)
- (24) 40 CFR 63.5910(d)
- (25) 40 CFR 63.5910(g)
- (26) 40 CFR 63.5910(h)
- (27) 40 CFR 63.5910(i)
- (28) 40 CFR 63.5915(a)(1)
- (29) 40 CFR 63.5915(c)
- (30) 40 CFR 63.5915(d)
- (31) 40 CFR 63.5920
- (32) 40 CFR 63.5930
- (33) 40 CFR 63.5935
- (34) Tables 1, 2, 3, 4, 5, 7, 8, 9, 13, 14, and 15 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (35) Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart WWWW (4W).

This NESHAP does not include testing requirements applicable to this source

This is an existing applicable requirement, however, Table 2 and 15 have been added as reference to applicable requirements.

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

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

<b>CAM Applicability Analysis</b>
-----------------------------------

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Shear mix tanks	N	-	-	-	100	No	-
Tanks	N	-	-	-	100	No	-

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

### State Rule Applicability Determination

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

- (a) 326 IAC 2-1.1-5 (Nonattainment New Source Review)  
 Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.
- (b) 326 IAC 2-2 (PSD)  
 PSD applicability is discussed under the Permit Level Determination – PSD section.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
 The operation of the two (2) shear mixing tanks and two (2) new resin storage tanks will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (d) 326 IAC 2-6 (Emission Reporting)  
 Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2016, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (e) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
 The two (2) shear mix tanks and two (2) resin storage tanks are subject to the requirements of 40 CFR 63, Subpart WWWW, incorporated by reference as 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), these tanks are not subject to the requirements of 326 IAC 8-1-6.
- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b)(14), two (2) shear mix tanks and one (1) new baghouse for the reinforced plastic composite panel cutting operation are exempt from the requirements of 326 IAC 6-3-2 because each unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

### 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 monitoring requirements applicable to this modification are as follows:

<b>Monitoring Requirements</b>			
<b>Emission Unit</b>	<b>Control Device</b>	<b>Operating Parameters</b>	<b>Frequency</b>
Reinforced plastic composite panel cutting operation (PCO)	Baghouse (DC2)	Visible Emissions	Once per day

The baghouse for the woodworking operation must operate properly to ensure compliance with 326 IAC 2-7-1(21)(J)(xxx)

There are no new applicable compliance testing requirements as a result of this modification

<b>Proposed Changes</b>
-------------------------

The changes listed below have been made to Part 70 Operating Permit No. T113-31469-00049. Deleted language appears as ~~struckthroughs~~ and new language appears in **bold**:

- (a) The following changes to the permit are made due to the proposed revision.
  - (1) New emission units have been updated in Sections A.2, A.3, D.1, D.2, and E.2.
  - (2) Condition D.1.1 and corresponding reporting form have been changed to reflect the adjustment of the PSD Minor Limit for VOC.
  - (3) Condition D.1.3 has been modified to remove the language specifying training requirements for resin mixing and storage tanks. The training requirements are applicable to resin and gel coat spraying operations. Although this language is a duplicate of language in Condition D.1.2, Condition D.1.2 is specifically applicable as the VOC BACT requirement (326 IAC 8-1-6) for the continuous lamination machine. Condition D.1.3 applies to all other applicable units.
  - (4) Condition D.2.1(c) has been removed because it is a compliance monitoring requirement and is a duplicate of Condition D.2.4. Language has been added to D.2.4 to indicate visible emission notations are optional when exhausting indoors.
- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit.
  - (1) Correction in the source address based on the Source Definition in Condition A.2.
  - (2) Inclusion of the title of SIC Code 3089.
  - (3) Deletion of duplicate language in Condition A.2(h) and respective D and E sections.
  - (2) The rule citation to 326 IAC 2-7-1(21)(J)(xxx) has been corrected throughout section D.2. A typographical error in Condition D.2.1(a) has been corrected. Reference to the record keeping requirement in 326 IAC 2-7-1(21)(J)(xxx) has been added to Condition D.2.9. Language has been added to Condition D.2.9(b) to reflect the language in the rule.
  - (3) IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

- (4) IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.
- (5) IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (6) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule site of the "responsible official" definition.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary fiberglass reinforced plywood panel manufacturing plant.

Source Address: 1491 **and 1493** Gerber Street, Ligonier, Indiana 46767  
General Source Phone Number: (574) 642-4888  
SIC Code 3089 (**Plastic Products, Not Elsewhere Classified**)  
...

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

---

...

~~(b) Two (2) resin storage tanks, constructed in 1996, with a maximum capacity of 6,000 gallons each. Under 40 CFR 63, Subpart WWWW, these tanks are considered HAP-containing material storage containers. This equipment is located at plant 1.~~

**(b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.**

...

(h) One (1) gel coat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through a stack S-3, and used to perform the following operations:

- (i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.
- (ii) Gel coat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method or Resin application, using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.
- (iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.
- (iv) Mold cleaning using acetone.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation. ~~Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.~~

This equipment will be located at plant 1.

**(i) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6**

**pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing tanks.**

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(14)]

---

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

...

- (b) Woodworking operations consisting of one (1) plywood cutting operation and one (1) fiberglass reinforced plywood panel cutting operation, constructed in 1996, maximum capacity of 6,000 pounds per hour, controlled by two (2) cyclones and a **two (2)** baghouses (DC1 **and** DC2) in series, design grain loading of one one-thousandths (0.001) grains per actual cubic foot, and a gas flow rate of twenty-eight thousand nine hundred (28,900) actual cubic feet per minute. This equipment is located in plant 1. [326 IAC 2-7-1(21)(~~KJ~~)(xxx)]

...

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:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(~~3435~~), and

...

- (c) A "responsible official" is defined at 326 IAC 2-7-1(~~3435~~).

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

---

...

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(~~3435~~).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

---

...

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(~~3435~~).

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. 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(~~3435~~).

...

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

---

...

The notification which shall be submitted by the Permittee 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(~~3435~~).

...

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(3435).

...

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(3435).

...

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

---

...

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(3435).

...

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

---

...

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 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(3435).

...

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

---

...

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(3435).

...

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

---

...

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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

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

---

...

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee 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(3435).

- (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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

(a) For new units:

**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.**

(b) For existing units:

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:

...

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(3435).

~~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. **The analog instrument shall be capable of measuring values outside of the normal range.**

...

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

---

...

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(3435).

...

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]

---

...

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(3435).

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. Support information includes the following, **where applicable:**
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following, **where applicable:**

...

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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(3435). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- ~~(b) Two (2) resin storage tanks, constructed in 1996, with a maximum capacity of 6,000 gallons each. Under 40 CFR 63, Subpart WWWW, these tanks are considered HAP containing material storage containers. This equipment is located at plant 1.~~

**(b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.**

- ...
- (h) One (1) gelcoat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through a stack S-3, used to perform the following operations:

(i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.

(ii) Gelcoat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method OR Resin application using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.

(iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.

(iv) Mold cleaning, using acetone.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation. ~~Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.~~

This equipment will be located at plant 1.

(i) **Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing tanks.**

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

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

##### D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the use of resins and gel coats at the one (1) continuous lamination machine, identified as SV1-1, the one (1) fluid impingement technology gel coat application system, identified as SV1-4, the one (1) fluid impingement technology gel coat application system, identified as SV1-4-B, the one (1) gel coat booth identified as GB1, the one (1) resin application booth, identified as RB1, and the one (1) gel coat/resin reciprocator, identified as P1-RGR1, combined, shall be limited such that the potential to emit (PTE) of VOC shall be less than two hundred forty-five (2405) tons per twelve (12) consecutive months with compliance determined at the end of each month.

...

##### D.1.3 Plastics Composites Production [326 IAC 20-56]

~~Pursuant to 320 IAC 20-56-1(a), the FRP composite production facilities located at this source and associated resin mixing and storage tanks are subject to the requirements of 326 IAC 20-56-2 because this source is a major source of HAPs that uses thermoset resins and/or gel coats that contain styrene.~~

...

##### D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements 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(3435).

...

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

Woodworking operations consisting of one (1) plywood cutting operation and one (1) fiberglass reinforced plywood panel cutting operation, constructed in 1996, maximum capacity of 6,000 pounds per hour, controlled by two (2) cyclones and a **two (2)** baghouses (DC1 and DC2) in series, design grain loading of one one-thousandths (0.001) grains per actual cubic foot, and a gas flow rate of twenty-eight thousand nine hundred (28,900) actual cubic feet per minute. This equipment is located in plant 1. [326 IAC 2-7-1(21)(KJ)(xxx)]

(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 Baghouse Limitations [326 IAC 2-7-1(21)(KJ)(xxx)]

The woodworking operations controlled by baghouse DC1 shall be considered insignificant activities for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(KJ)(xxx), including the following:

- (a) The baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of ~~three-thousandths~~ **one-hundredth** (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- ~~(c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with 40 CFR 60, Appendix A, Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:~~
  - ~~(1) The baghouse shall be inspected.~~
  - ~~(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.~~

Compliance Determination Requirements

D.2.2 Particulate Control [326 IAC 2-7-6(6)] [326 IAC 2-7-1(21)(KJ)(xxx)(DD)]

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

D.2.4 Visible Emissions Notations [326 IAC 2-7-1(21)(KJ)(xxx)(EE)]

- (a) Daily visible emission notations of the woodworking operations stack exhausts shall be performed during normal daylight operations in accordance with 40 CFR 60, Appendix A, Method 22 when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. **Visible emission monitoring is optional when venting to the indoors.**

...

D.2.5 Baghouse Inspections [326 IAC 2-7-1(21)(KJ)(xxx)(FF)]

...

D.2.7 Cyclone Inspections [326 IAC 2-7-1(21)(KJ)(xxx)(FF)]

---

...

D.2.9 Record Keeping Requirements [326 IAC 2-7-1(21)(J)(xxx)(GG)]

---

...

- (b) To document the compliance status with Conditions D.2.5 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.7 and the dates the vents are redirected **indoors or to the atmosphere**.
- (c) The Permittee shall maintain records of corrective actions to document the compliance status with 326 IAC 2-7-1(21)(KJ)(xxx)(GG)(dd).

...

SECTION E.1 FACILITY OPERATION CONDITIONS

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

...

~~(b) Two (2) resin storage tanks, constructed in 1996, with a maximum capacity of 6,000 gallons each. Under 40 CFR 63, Subpart WWWW, these tanks are considered HAP-containing material storage containers. This equipment is located at plant 1.~~

**(b) Two (2) polyester resin storage tanks, approved in 2014 for construction, identified as T1 and T2, each with a maximum capacity of 5,500 gallons each. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these storage tanks are considered new HAP-containing material storage containers.**

...

(h) One (1) gelcoat/resin reciprocator, constructed in 2009, identified as P1-RGR1, with a maximum throughput of 4.67 units per hour, exhausting through stack S-3, used to perform the following operations:

- (i) Mold preparation, using 0.11 gallons of material per unit, with manual application method.
- (ii) Gelcoat application, using 4.32 gallons of material with Mechanical Non-Atomized Application method OR Resin application using 11 gallons of material per unit, with Mechanical Non-Atomized Application method.
- (iii) Catalyst application, using 0.8 gallons of material with Mechanical Non-Atomized Application.
- (iv) Mold cleaning, using acetone.

Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation. ~~Under 40 CFR 63, Subpart WWWW, this is considered an existing open molding reinforced plastic composites production operation.~~

This equipment will be located at plant 1.

**(i) Two (2) covered shear mixing tanks, constructed in 1996, identified as SM1 and SM2, each with a maximum capacity of 955.6 pounds of resin per hour and 168.6 pounds of calcium sulfate per hour, and exhausting indoors. These tanks are located at plant 1.**

**Under 40 CFR 63, Subpart WWWW, these mixing tanks are considered existing mixing**

**tanks.**

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

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

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

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

- (34) Tables 1, 2, 3, 4, 5, 7, 8, 9, 13, ~~and~~ 14, and 15 to 40 CFR 63 Subpart WWWW (the applicable portions)

**Part 70 Quarterly Report**

Limit: Less than two hundred forty-five (240~~5~~) tons combined per twelve (12) consecutive month period, with compliance determined at the end of each month. The Permittee shall calculate emissions using emission factors derived from stack tests or Unified Emission Factors.

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 113-34354-00049. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Ryan Graunke 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (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](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Source Summary**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

**Unlimited potential to emit (ton/yr)**

Process	Emission Unit ID	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG as CO <sub>2</sub> e	Total HAPs	Single HAPs
Continuous laminator	SV1-1, SV1-1, and SV1-4b	-	-	-	-	-	22.2	-	-	21.9	20.7 Styrene
Gel coat and resin booths	GB1 and RB1	34.13	34.13	34.13	-	-	101.02	-	-	91.99	60.95 Styrene
Reciprocator	P1-RGR1	-	-	-	-	-	146.22	-	-	126.64	87.77 Styrene
Shear mix tanks	SM1 and SM2	1.48	1.48	1.48	-	-	7.01	-	-	7.01	7.01 Styrene
Panel cutting	Insig	43.4	43.4	43.4	-	-	-	-	-	-	-
Natural gas combustion	Insig	0.08	0.30	0.30	0.02	4.00	0.22	3.36	4,826	0.08	0.07 Hexane
Tanks	T1 and T2	-	-	-	-	-	0.06	-	-	0.06	0.06 Styrene
<b>Total</b>	<b>-</b>	<b>79.1</b>	<b>79.3</b>	<b>79.3</b>	<b>0.02</b>	<b>4.00</b>	<b>276.7</b>	<b>3.36</b>	<b>4,826</b>	<b>247.7</b>	<b>176.46 Styrene</b>

**Limited potential to emit (ton/yr)**

Process	Emission Unit ID	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG as CO <sub>2</sub> e	Total HAPs	Single HAPs
Continuous laminator	SV1-1, SV1-1, and SV1-4b	-	-	-	-	-	240.00	-	-	19.5	18.4 Styrene
Gel coat and resin booths	GB1 and RB1	34.13	34.13	34.13	-	-		-	-	82.0	54.3 Styrene
Reciprocator	P1-RGR1	-	-	-	-	-		-	-	112.8	78.2 Styrene
Shear mix tanks	SM1 and SM2	1.48	1.48	1.48	-	-	7.01	-	-	7.0	7.01 Styrene
Panel cutting	Insig	2.17	2.17	2.17	-	-	-	-	-	-	-
Natural gas combustion	Insig	0.08	0.30	0.30	0.02	4.00	0.22	3.36	4,826	0.08	0.07 Hexane
Tanks	T1 and T2	-	-	-	-	-	0.06	-	-	0.06	0.06 Styrene
<b>Total</b>	<b>-</b>	<b>37.9</b>	<b>38.1</b>	<b>38.1</b>	<b>0.02</b>	<b>4.00</b>	<b>247.3</b>	<b>3.36</b>	<b>4,826</b>	<b>221.4</b>	<b>157.97 Styrene</b>

**HAPs (ton/yr)**

Process	Emission Unit ID	Unlimited					Limited*				
		Styrene	Methyl Methacrylate	Dimethyl Phthalate	Hexane	Total HAPs	Styrene	Methyl Methacrylate	Dimethyl Phthalate	Hexane	Total HAPs
Continuous laminator	SV1-1, SV1-1, and SV1-4b	20.67	0.79	0.46	-	21.92	18.42	0.70	0.41	-	19.53
Gel coat and resin booths	GB1 and RB1	60.95	19.30	11.74	-	91.99	54.30	17.19	10.46	-	81.95
Reciprocator	P1-RGR1	87.77	38.87	-	-	126.64	78.19	34.63	-	-	112.82
Shear mix tanks	SM1 and SM2	7.01	-	-	-	7.01	7.01	-	-	-	7.01
Panel cutting	Insig	-	-	-	-	-	-	-	-	-	-
Natural gas combustion	Insig	-	-	-	0.072	0.075	-	-	-	0.072	0.075
Tanks	T1 and T2	0.055	-	-	-	0.055	0.0554	-	-	-	0.06
<b>Total</b>	<b>-</b>	<b>176.46</b>	<b>58.95</b>	<b>12.21</b>	<b>0.07</b>	<b>247.70</b>	<b>157.97</b>	<b>52.52</b>	<b>10.88</b>	<b>0.07</b>	<b>221.44</b>

\*VOC limit will also proportionally limit HAPs, adjusted by the ratio of limited/unlimited PTE of VOC

**Appendix A: Emission Calculations**  
**Continuous Laminator Machine, Plant 1**  
**One (1) Resin applicator (SV1-1) and two (2) Fluid Impingement Technology (FIT) gel coat applicators (SV1-4 and SV1-4B)**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

Emission unit	Material	Density (lbs/gal)	Weight % styrene	Weight % MMA	Weight % DEP	Weight % VOC	Max usage rate (gals/part)	Max production (parts/hour)	Max usage (tons/yr)	Emission Factors (% Flashoff)		HAPs				
										Styrene or DEP	MMA	PTE of Styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of DEP (tons/yr)	PTE of Total HAPS (tons/yr)	PTE of VOC (tons/yr)
Resin (SV1-1)	Resin	9.18	33.5%	-	-	33.5%	2.42	86.0	8,368	0.67%	-	18.8	-	-	18.78	18.8
	Catalyst-Norox MEKP-9	8.00	-	-	43.0%	65.0%	0.048	86.0	145	0.67%	-	-	-	0.42	0.42	0.63
Gel coat (SV1-4)	Gel Coat	10.7	32.3%	4.00%	-	36.3%	0.35952	86.0	1,449	0.19%	0.68%	1.00	0.39	-	1.39	1.39
	Catalyst-Norox MEKP-9	8.00	-	-	43.0%	65.0%	0.00962	86.0	29.0	0.19%	-	-	-	0.02	0.02	0.04
Gel coat (SV1-4b)	Lilly Gel Kotes	10.7	32.3%	4.00%	-	36.3%	0.35952	86.0	1,449	0.19%	0.68%	0.89	0.39	-	1.28	1.28
	Catalyst-Norox MEKP-9	8.00	-	-	43.0%	65.0%	0.00962	86.0	29.0	0.19%	-	-	-	0.02	0.02	0.04
<b>Totals:</b>												<b>20.7</b>	<b>0.79</b>	<b>0.46</b>	<b>21.92</b>	<b>22.2</b>

**Notes:**

MMA = Methyl methacrylate, a VOC & HAP

DEP = Dimethyl Phthalate, a VOC & HAP

Transfer efficiency is 100% for the processes. Therefore, there are no potential particulate emissions.

Usages:

Gel Coat Usage = 330.83 lb/hr per Section A.2(c) of the Title V Operating Permit No. 113-7113-00049 issued April 18, 2000.

Resin Usage = Usage rate from Construction Permit CP-113-4957, November 1, 1995

Catalyst Usage for Gel Coat = Two percent (2%) by weight of Gel Coat usage; physical properties from Construction Permit CP-113-4957

Catalyst Usage for Resin = Usage rate and physical properties from Construction Permit CP-113-4957

Emission Factors:

Emission factors (% Flashoff) for styrene and MMA for resin and gel coat application are from Appendix A of the Significant Source Modification 113-15275-00049 based upon performance testing conducted November 21, 1999 for resin application and June 14, 2001 for Gel Coat application. Testing has correlated emissions to the quantity of styrene and MMA in applied resins and gel coat.

Styrene emission factors (% Flashoff) were used for catalyst DEP components in resin and gel coat application, respectively.

Application Methods:

The gel coat application equipment is non-atomizing per the Technical Support Document for SSM 113-12529-00049, September 27, 2000

The resin application equipment is non-atomizing per the Technical Support Document for Construction Permit CP-113-4957, November 1, 1995

**Methodology:**

Maximum usage (tons/yr) = Density (lbs/gal) \* Max usage rate (gals/part) \* Maximum production rate (parts/hour) \* 8,760 hrs/year \* 1 ton/2,000 lbs

PTE of HAPs (tons/yr) = Max Usage (tons/yr) \* Weight % Styrene or MMA \* Emission Factor (% Flashoff)

PTE of VOC for resin and gel coat (tons/yr) =  $\sum$  PTE of HAPs (tons/yr)

PTE of VOC for catalyst (tons/yr) = Max Usage (tons/yr) \* Weight % VOC \* Emission Factor (% Flashoff)

**Appendix A: Emissions Calculations**  
**Gel coat application booth (GB1) and resin application booth (RB1)**

**Company Name:** Tower Structural Laminating, Inc.  
**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767  
**Part 70 Operating Permit Renewal:** T113-31469-00049  
**Part 70 Significant Permit Modification:** 113-34354-00049  
**Reviewer:** Ryan Graunke

Material	Application method	Density (lb/gal)	Weight % styrene	Weight % MMA	Weight % DEP	Weight % VOC	Max usage rate (gals/part)	Max production (parts/hour)	Max usage (tons/yr)	UEF (lbs styrene/ton resin or gel)	UEF (lbs MMA/ton resin or gel)	HAPs			PTE of Total HAPS (tons/yr)	PTE of VOC (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)	
												PTE of styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of DEP (tons/yr)					
Oxford White gelcoat	Air-assisted Airless	10.70	25.000%	15.000%	-	40.00%	3.66	1.00	171.53	222.5	225.0	19.08	19.30	-	38.38	38.38	75%	25.73	
Catalyst-Norox MEKP-9		9.170	-	-	43.00%	65.00%	0.085	1.00	3.41	-	-	-	-	1.47	1.47	2.22	75%	0.30	
Resin as Applied	Non-atomizing (FIT)	9.140	32.80%	-	-	32.80%	29.8	1.00	1192.99	70.2	-	41.87	-	-	41.87	41.87	99%	8.02	
Catalyst-Norox MEKP-9		9.170	-	-	43.00%	65.00%	0.595	1.00	23.90	-	-	-	-	10.28	10.28	15.53	99%	0.08	
Polycor Mold Release	Manual	7.480	-	-	-	92.00%	0.10	1.00	3.28	-	-	-	-	-	-	3.01	100%	-	
<b>Totals:</b>												<b>60.95</b>	<b>19.30</b>	<b>11.74</b>	<b>91.99</b>	<b>101.02</b>			<b>34.13</b>

**Notes:**

MMA = methyl methacrylate, a VOC & HAP  
 DEP = dimethyl phthalate, a VOC & HAP  
 Catalyst-Norox MEKP-9 is added to both the gelcoat and resin substrate prior to application.  
 Unified emission factors (UEF) are from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 13, 2009).  
 Available at: [http://www.in.gov/idem/ctap/files/plastics\\_unified\\_emission\\_factors.pdf](http://www.in.gov/idem/ctap/files/plastics_unified_emission_factors.pdf)  
 It is assumed that all of the VOC input for the Polycor mold release and catalyst is emitted.  
 PM = PM<sub>10</sub> = PM<sub>2.5</sub>.

**Methodology:**

Maximum usage (tons/yr) = Density (lbs/gal) \* Max usage rate (gals/part) \* Maximum production rate (parts/hour) \* 8,760 hrs/year \* 1 ton/2,000 lbs  
 UEF of styrene for gelcoat (lbs/ton) = ((0.4506 \* Weight % styrene) - 0.0505) \* 2000 \* 85% (for covered-cure)  
 UEF of VOC for gelcoat (lbs/ton) = UEF of styrene + UEF of MMA  
 UEF of styrene/VOC for resin (lbs/ton) = 0.107 \* Weight % styrene/VOC \* 2000 \* 85% (for covered-cure)  
 PTE of styrene (ton/yr) = Maximum usage (tons/yr) \* (UEF (lb styrene/ton resin or gel)) \* 1 ton material/2000 lbs material  
 PTE of MMA (ton/yr) = Maximum usage (tons/yr) \* (UEF (lb MMA/ton resin or gel)) \* 1 ton material/2000 lbs material  
 PTE of DEP (ton/yr) = Maximum usage (tons/yr) \* Weight % DEP  
 PTE of VOC for gelcoat (ton/yr) = PTE of styrene (ton/yr) + PTE of MMA (ton/yr) (if applicable) + PTE of DEP (ton/yr) (if applicable)  
 PTE of VOC for mold release and catalyst (ton/yr) = Maximum usage (tons/yr) \* Weight % VOC  
 Uncontrolled PTE of PM (ton/yr) = Maximum usage (tons/yr) \* (1 - Weight % VOC) \* (1 - Transfer efficiency)

**Appendix A: Emissions Calculations  
Gel coat/resin reciprocator (P1-RGR1)**

**Company Name:** Tower Structural Laminating, Inc.  
**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767  
**Part 70 Operating Permit Renewal:** T113-31469-00049  
**Part 70 Significant Permit Modification:** 113-34354-00049  
**Reviewer:** Ryan Graunke

Material	Application method	Density (lb/gal)	Weight % styrene	Weight % MMA	Weight % AMS	Weight % VOC	Max usage rate (gals/part)	Max production (parts/hour)	Max usage (tons/yr)	UEF (lbs styrene/ton resin or gel)	UEF (lbs MMA/ton resin or gel)	UEF (lbs VOC/ton resin or gel)	HAPs			
													PTE of styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of Total HAPS (tons/yr)	PTE of VOC (tons/yr)
Zyvax Fiberglass Shield	Manual	7.31	-	-	-	90.00%	0.11	4.67	16.45	N/A	N/A	N/A	-	-	-	14.80
Envirotech Oxford White 5794W90435 - Gel coat*	Mechanical Non-Atomized Application / Controlled Reciprocator	11.730	30.00%	5.00%	-	35.00%	4.32	4.67	1036.51	169.36	75	244.36	87.77	38.87	126.64	126.64
AOC Resin C979-GCD-20 - Resin*	Mechanical Non-Atomized Flow Coating with Covered Cure After Rollout / Controlled Spray Application	9.180	30.00%	-	5.0%	35.00%	11.00	4.67	2065.51	54.57	-	63.67	56.36	-	56.36	65.75
MEKP L50A	Mechanical, Non-Atomized	8.340	-	-	-	60.00%	0.88	4.67	150.12	-	-	63.67	-	-	-	4.78
Acetone	Manual	6.610	-	-	-	0.00%	0.50	4.67	67.60	-	-	-	-	-	-	-
<b>Totals:</b>													<b>87.77</b>	<b>38.87</b>	<b>126.64</b>	<b>146.22</b>

**Notes:**

MMA = methyl methacrylate, a VOC & HAP

AMS = alpha methyl styrene, a VOC, non-HAP

Pursuant to 40 CFR 51.100(s)(1), acetone is an exempt VOC compound.

\*The application of gel coat and resin are mutually exclusive operations (i.e., only one material may be applied at a time), all other materials are used with either gel coat or resin.

Gel coat application is the worst-case scenario

Unified emission factors (UEF) are from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 13, 2009).

Available at: [http://www.in.gov/idem/ctap/files/plastics\\_unified\\_emission\\_factors.pdf](http://www.in.gov/idem/ctap/files/plastics_unified_emission_factors.pdf)

UEF of VOC for gel coat is the sum of UEF for styrene and MMA

UEF of VOC for resin based on the weight % VOC (styrene + AMS)

UEF of VOC for MEKP L50A is assumed equal to UEF of resin as a conservative estimate.

It is assumed that all of the VOC input for the Zyvax Fiberglass Shield is emitted.

Transfer efficiency is 100% for the processes. Therefore, there are no potential particulate emissions.

**Methodology:**

Maximum usage (tons/yr) = Density (lbs/gal) \* Max usage rate (gals/part) \* Maximum production rate (parts/hour) \* 8,760 hrs/year \* 1 ton/2,000 lbs

UEF of styrene for gel coat (lbs/ton) = ((0.4506 \* Weight % styrene) - 0.0505) \* 2000 \* 85% (for covered-cure)

UEF of VOC for gel coat (lbs/ton) = UEF of styrene + UEF of MMA

UEF of styrene/VOC for resin (lbs/ton) = 0.107 \* Weight % styrene/VOC \* 2000 \* 85% (for covered-cure)

PTE of styrene (ton/yr) = Maximum usage (tons/yr) \* (UEF (lb styrene/ton resin or gel)) \* 1 ton material/2000 lbs material

PTE of MMA (ton/yr) = Maximum usage (tons/yr) \* (UEF (lb MMA/ton resin or gel)) \* 1 ton material/2000 lbs material

PTE of VOC for Zyvax Fiberglass Shield (ton/yr) = Maximum usage (tons/yr) \* Weight % VOC

PTE of VOC for gelcoat (ton/yr) = PTE of styrene (ton/yr) + PTE of MMA (ton/yr) (if applicable)

PTE of VOC for resin (ton/yr) = Maximum usage (tons/yr) \* (UEF (lb VOC/ton resin or gel)) \* 1 ton material/2000 lbs material

PTE of VOC for Zyvax Fiberglass Shield (ton/yr) = Maximum usage (tons/yr) \* Weight % VOC

Uncontrolled PTE of PM (ton/yr) = (1 - (Weight % styrene + Weight % MMA)) \* (1 - Transfer efficiency)

**Appendix A: Emissions Calculations**  
**Plywood cutting operation and fiberglass reinforced plywood panel cutting operation**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

Process	Control	Weight % VOC/Styrene	Filler/powder loading %	Maximum resin throughput (ton/yr)	Maximum filler throughput (ton/yr)	VOC/Styrene emission factor	PTE of VOC/Styrene (lb/hr)	PTE of VOC/Styrene (ton/yr)	PM emission factor	PTE of PM (lb/hr)	PTE of PM (ton/yr)
Shear mix tank (SM1)	Covered mixing	33.5%	15.0%	955.27	168.58	0.25%	0.80	3.50	0.10%	0.17	0.74
Shear mix tank (SM2)	Covered mixing	33.5%	15.0%	955.27	168.58	0.25%	0.80	3.50	0.10%	0.17	0.74
<b>Totals:</b>							<b>1.60</b>	<b>7.01</b>		<b>0.34</b>	<b>1.48</b>

**Notes:**

All VOC/HAP is styrene

PM=PM<sub>10</sub>=PM<sub>2.5</sub>

VOC/HAP emission factor is from NESHAP Subpart WWWW

PM emission factor is based on assumption of 0.10% of material added to the mixer is lost

Methodology used was taken from Title V Renewal T039-174650-00097 for Truck Accessories Group, LLC dab Leer Midwest.

**Methodology:**

Maximum resin throughput (lb/hr) = Maximum throughput of resin in continuous laminator (Page 1) (ton/yr) / 8760 hr/yr \* 2000 lbs/ton / 2

Maximum filler throughput (lb/hr) = Maximum resin throughput (lb/hr) / (1 - Filler/powder loading %)

PTE of VOC (lb/hr) = Maximum resin throughput (lb/hr) \* Weight % VOC/HAP \* VOC/HAP emission factor

PTE of PM (ton/yr) = Maximum filler throughput (tons/yr) \* PM emission factor

PTE (ton/yr) = PTE (lb/hr) \* 8760 hr/yr \* 1 ton/2000 lb

**Appendix A: Emissions Calculations**  
**Plywood cutting operation (PSO-DC1) and fiberglass reinforced plywood panel cutting operation (PCO-DC2)**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

Emission Unit ID	Airflow (acfm)	Particulate outflow grain loading (gr/acf)	Control Efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
PSO-DC1	28,900	0.001	95.0%	4.95	21.70	0.25	1.08
PCO-DC2*	28,900	0.001	95.0%	4.95	21.70	0.25	1.08
<b>Totals:</b>				<b>9.91</b>	<b>43.40</b>	<b>0.50</b>	<b>2.17</b>

**Notes:**

\*A second identical baghouse was installed in 2012 to control emissions from the reinforced plastic composites cutting operation. Although the new baghouse did not affect the process or emission units, the uncontrolled PTE is shown to increase because PTE has been calculated based on the airflow, outflow grain loading, and control efficiency of the two identical baghouses. These units are insignificant pursuant to 326 IAC 2-7-1(21)(J)(xxx). Therefore PTE after control is consider for permit level determination.  
 PM=PM<sub>10</sub>=PM<sub>2.5</sub>

**Methodology:**

Uncontrolled PTE = Grain loading rate (grains/acf) \* Air flow rate (acfm) \* 60 min/hr \* 1 lb/7000 grains / (1 - Control efficiency)

Controlled PTE of PM (lb/hr) = Grain loading rate (grains/acf) \* Air flow rate (acfm) \* 60 min/hr \* 1 lb/7000 grains

PTE of PM (ton/yr) = PTE of PM (lb/hr) \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

Emission unit	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Radiant heaters	4	0.100	3.4
Radiant heater	1	0.250	2.1
Radiant heater	1	0.330	2.8
Air make-up	2	1.000	17.2
Air make-up	1	1.980	17.0
Air make-up	1	3.850	33.1
Air make-up	1	0.500	4.3
<b>Totals:</b>		<b>9.310</b>	<b>80.0</b>

	Pollutant						
	PM*	PM <sub>10</sub> *	Direct PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.08	0.30	0.30	0.02	4.00	0.22	3.36

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined.

PM<sub>2.5</sub> emission factor is filterable and condensable PM<sub>2.5</sub> combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	8.395E-05	4.797E-05	2.998E-03	7.196E-02	1.359E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	1.999E-05	4.398E-05	5.597E-05	1.519E-05	8.395E-05
<b>Total HAPs:</b>					<b>7.545E-02</b>

	Greenhouse Gas		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor (lb/MMCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	4,797	0.1	0.1
Summed Potential Emissions (tons/yr)	4,798		
CO <sub>2</sub> e Total (tons/yr)	4,826		

**Notes:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

**Methodology:**

Total Heat Input Capacity (MMBtu/hr) = Σ (Heat Input Capacity Each (MMBtu/hr/unit) \* Number of Units)

Total Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) \* Number of Units \* 8,760 hrs/yr \* High Heat Value (1 MMCF/1,020 MMBtu)

Potential Emission (tons/yr) = Total Potential Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) \* 1 ton/2000 lbs

CO<sub>2</sub>e (tons/yr) = CO<sub>2</sub> Potential Emission (tons/yr) \* CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission (tons/yr) \* CH<sub>4</sub> GWP (25) + N<sub>2</sub>O Potential Emission (tons/yr) \* N<sub>2</sub>O GWP (298).

**Appendix A: Emissions Calculations  
VOC storage tanks**

**Company Name:** Tower Structural Laminating, Inc.

**Address:** 1491 and 1493 Gerber Street, Ligonier, IN 46767

**Part 70 Operating Permit Renewal:** T113-31469-00049

**Part 70 Significant Permit Modification:** 113-34354-00049

**Reviewer:** Ryan Graunke

Tank	Capacity	Annual emissions (lb/yr)	PTE of styrene (lb/hr)	PTE of styrene (lb/day)	PTE of styrene (ton/yr)
Resin storage 1	5,500	47.45	0.0054	0.1300	0.0237
Resin storage 2	5,500	47.45	0.0054	0.1300	0.0237
Gel coat storage	4000	12.15	0.0014	0.0333	0.0061
Misc.	1200	3.73	0.0004	0.0102	0.0019
<b>Total:</b>					<b>0.055</b>

**Note:**

The VOC potential passive emissions for the tanks were calculated using the U.S. EPA TANKS 4.0.9d program.



# 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: Heather Johnson  
Tower Structural Laminating  
PO Box 463  
Goshen, Indiana 46527

DATE: July 29, 2014

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

SUBJECT: Final Decision  
Title V – Significant Permit Modification  
113-34354-00049

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:  
Al Schroeder, Plant Manager / Tower Structural Laminating  
Kevin Parks / D & B Environmental Services, 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



# 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*

July 29, 2014

TO: Ligonier Public Library

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

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

**Applicant Name: Tower Structural Laminating**  
**Permit Number: 113-34354-00049**

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

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

Enclosures  
Final Library.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	AWELLS 7/29/2014 Tower Structural Laminating 113-34354-00049 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Heather Johnson Tower Structural Laminating PO B0x 463 Goshen IN 46527 (Source CAATS) confirmed delivery										
2		Al Schroeder Plant Mgr Tower Structural Laminating 1491 Gerber St Ligonier IN 46767 (RO CAATS)										
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)										
4		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 (Health Department)										
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
7		Ligonier City Council and Mayors Office 103 West Third Street Ligonier IN 46767 (Local Official)										
8		Ligonier Public Library 300 S Main St Ligonier IN 46767-1812 (Library)										
9		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
8			