INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	July 22, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	Composite Technology Assemblies, LLC
Permit Level:	Title V - Significant Permit Modification
Permit Number:	099 - 34390 - 00023
Source Location:	904 Markley Drive, Plymouth, Indiana
Type of Action Taken:	Modification at an existing source Revisions to permit requirements

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 34390.

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 impractible 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.

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Mr. Mark Naylor
Composite Technology Assemblies, LLC
P.O. Box 82
Plymouth, IN 46563-0082

July 22, 2014

Re: 099-34390-00023
Significant Permit Modification to
Part 70 Renewal No.: T099-29072-00023

Dear Mr. Naylor:

Composite Technology Assemblies, LLC was issued Part 70 Operating Permit Renewal No. T099-29072-00023 on January 14, 2011 for a stationary fiberglass truck cover manufacturing and painting source located at 904 Markley Drive, Plymouth, IN 46563. An application to modify the source was received on April 2, 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 attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: 40 CFR 63, Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products
Attachment B: 40 CFR 63, Subpart WWWW, NESHAP 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.

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

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 Sarah Street, of my staff, at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit and Technical Support Document

SC/ss

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

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Commissioner

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

Composite Technology Assemblies, LLC
904 Markley Drive
Plymouth, Indiana 46563

(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.: T099-29072-00023	
Issued by: Original Signed Donald F. Robin, Section Chief Permits Branch, Office of Air Quality	Issuance Date: January 14, 2011 Expiration Date: January 14, 2016

Significant Permit Modification No.: 099-32847-00023, issued on June 26, 2013

Significant Permit Modification No.: 099-34390-00023	
Issued by: Iryn Calilung Section Chief, Permits Branch Office of Air Quality	Issuance Date: July 22, 2014 Expiration Date: January 14, 2016

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Attachment B: 40 CFR 63.5780, Subpart WWWW, NESHAP 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary fiberglass products manufacturing and painting source.

Source Address:	904 Markley Drive, Plymouth, Indiana 46563
General Source Phone Number:	(574) 936-3196
SIC Code:	3089 (Plastics products, NEC)
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a FIT applicator for filled resin, installed in 1976 and modified in 2014, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The FIT applicator used to manufacture filled resin truck covers and the FIT applicator used to manufacture neat resin transportation parts are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of twenty-five (25) fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 and approved in 2014 for modification, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

(c) One (1) high volume, low pressure (HVLP) tooling gel coat applicator booth, identified as MSG, for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per

hour, approved for construction in 2013, using dry filters for particulate control and exhausting to stack MSGS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling gel coat applicator, identified as MSG, is considered an existing affected facility.

(d) One (1) FIT non-atomizing tooling resin applicator, identified as MSR, for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per hour, approved for construction in 2013, no control, and exhausting to stack MSRS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling resin applicator, identified as MSR, is considered an existing affected facility.

(e) One (1) paint booth, identified as A, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #7.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as A, is considered an affected facility.

(f) One (1) paint booth, identified as B, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #8.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as B, is considered an affected facility.

(g) One (1) paint booth, identified as C, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #9.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as C, is considered an affected facility.

(h) One (1) paint booth, identified as D, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #10.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as D, is considered an affected facility.

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart

WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

(s) Two (2) FRP parts trimming booths, identified as TB1 and TB2, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing internal return-air recirculating dust collection system for particulate control;

The trimming booths are equipped with eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws.

(t) Natural gas combustion units, including the following:

(1) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 5.04 MMBtu/hr, utilizing no control, and exhausting indoors;

(2) One (1) air make-up unit, identified as AM2, with a maximum heat input capacity of 2.31 MMBtu/hr, utilizing no control, and exhausting indoors;

(3) One (1) radiant heater, identified as H1, with a maximum heat input capacity of 0.24 MMBtu/hr, utilizing no control, and exhausting indoors;

(4) One (1) radiant heater, identified as H2, with a maximum heat input capacity of 0.125 MMBtu/hr, utilizing no control, and exhausting indoors;

(5) Seventeen (17) radiant heaters, identified as H3 through H19, each with a maximum heat input capacity of 0.01 MMBtu/hr, utilizing no control, and exhausting indoors;

(6) Five (5) forced-air heaters, identified as H20 through H25, each with a maximum heat input capacity of 0.06 MMBtu/hr, utilizing no control, and exhausting indoors.

A.3 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) Other categories with emissions below insignificant thresholds:

(1) One (1) grinding area, identified as GR, with a maximum capacity of four (4) fiberglass parts per hour, using an internal return-air recirculating dust collection system for particulate control, installed in 1976, and modified in 2014. [326 IAC 6-3-2]

(2) One (1) cut out area, identified as CO, with a maximum capacity of four (4) fiberglass truck toppers per hour, for cutting out windows for truck toppers, using an internal return-air recirculating dust collection system for particulate control, installed in 1976, and modified in 2014. [326 IAC 6-3-2]

(b) Paved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T099-29072-00023, 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 T099-29072-00023 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) or (c). 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 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.7 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

(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.10 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.11 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.12 Risk Management Plan [326 IAC 2-7-5(11)] [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.13 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.14 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.15 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.16 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.17 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a FIT applicator for filled resin, installed in 1976 and modified in 2014, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The FIT applicator used to manufacture filled resin truck covers and the FIT applicator used to manufacture neat resin transportation parts are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of twenty-five (25) fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 and approved in 2014 for modification, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

(c) One (1) high volume, low pressure (HVLP) tooling gel coat applicator booth, identified as MSG for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per hour, approved for construction in 2013, using dry filters for particulate control and exhausting to stack MSGS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling gel coat applicator, identified as MSG, is considered an existing affected facility.

(d) One (1) FIT non-atomizing tooling resin applicator, identified as MSR for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per hour, approved for construction in 2013, no control, and exhausting to stack MSRS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling resin applicator, identified as MSR, is considered an existing affected facility.

(e) One (1) paint booth, identified as A, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #7.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as A, is considered an affected facility.

(f) One (1) paint booth, identified as B, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #8.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart

PPPP), the paint booth, identified as B, is considered an affected facility.

(g) One (1) paint booth, identified as C, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #9.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as C, is considered an affected facility.

(h) One (1) paint booth, identified as D, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #10.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as D, is considered an affected facility.

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total VOC emissions from the use of all gelcoats, resins, paints, coatings, catalysts, solvents and adhesives from the following fiberglass manufacturing and surface coating operations shall not exceed 249.00 tons of per twelve (12) consecutive month period with compliance determined at the end of each month:

Emission unit(s)	VOC Content Limit (tons per year)
Chopper area (CA)	249.00
Gel area (GA)	
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	
Resin Transfer Molding (RTM1)	
RTM1 HVLP Gelcoat applicator (RTMG1)	
FIT Gelcoat area (P2-01 through P2-07)	
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	
HVLP barrier coat resin applicator (P2-12)	
Resin Transfer Molding (RTM2)	
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	
Resin Transfer Molding (RTM3)	
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	
Paint Booth A	
Paint Booth B	
Paint Booth C	
Paint Booth D	

Compliance with this limit, combined with the unlimited potential to emit of VOC from natural gas-fired combustion units, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) gel area, identified as GA, the four (4) paint booths, identified as A, B, C and D, the Mold Shop activities from MSG, the RTM1 HVLP Gelcoat applicator (RTMG1), the FIT Gelcoat area (P2-01 through P2-07), the RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and the RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5) shall each be controlled by dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control devices in accordance with manufacturer specifications.

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

Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following 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 subdivision (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 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC emission limitation contained in Condition D.1.1 for the Paint Booth A, Paint Booth B, Paint Booth C, and Paint Booth D shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The Permittee shall prepare or obtain from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets or Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst, solvent and mold release agent used in the open and closed molding operations.

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows for the following open and closed molding operations:

Chopper area (CA)
Gel area (GA)
Mold Shop: HVLP tooling gel coat applicator booth (MSG)
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)
Resin Transfer Molding (RTM1, RTM2, and RTM3)
HVLP Gelcoat applicators (RTMG1, RTMG2, RTMG3, RTMG4, and RTMG5)
FIT Gelcoat area (P2-01 through P2-07)
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)

HVLP barrier coat resin applicator (P2-12)
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)

(1) Monthly VOC emissions of the open and closed molding operations shall be calculated with the following equation:

$$E_{VOC} = \sum [E_{gelcoat} + E_{resin} + E_{cat} + E_{sol}]$$

Where:

E_{VOC} = VOC emissions from open and closed molding operations (tons/month)
$E_{gelcoat}$ = VOC emissions from gel coats of open and closed molding operations (tons/month)
E_{resin} = VOC emissions from resins of the open and closed molding operations (tons/month)
E_{cat} = VOC emissions from catalysts of the open and closed molding operations (tons/month)
E_{sol} = VOC emissions from all other solvents (tons/month)

(2) VOC emissions from the gel coats of the open and closed molding operations shall be calculated by multiplying the monthly usage of each gel coat by the emission factor provided in the Unified Emission Factors for Open Molding of Composites, using the following equation:

$$E_{gelcoat} = \sum [(G_{gelcoat} * D_{gelcoat} * EF) / 2000]$$

Where:

$E_{gelcoat}$ = VOC emissions from gel coats (tons/month)
$G_{gelcoat}$ = gallons of gel coat used per month (gallons/month)
$D_{gelcoat}$ = density of gel coat (pounds/gallon)
EF = VOC Emission factor of the gel coat (weight %), or VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Unified Emission Factors for Open Molding of Composites.

(3) VOC emissions from the resins of the open and closed molding operations shall be calculated by multiplying the monthly usage of each resin by the emission factor provided in "Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2" for closed molding operations and the Unified Emission Factors for Open Molding of Composites for close molding operations, using the following equation:

$$E_{resin} = \sum [(G_{resin} * D_{resin} * EF) / 2000]$$

Where:

E_{resin} = VOC emissions from resins (tons/month)
G_{resin} = gallons of resin used per month (gallons/month)
D_{resin} = density of resin (pounds/gallon)
EF = VOC Emission factor of the resin (weight %), or VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2 and the Unified Emission Factors for Open Molding of Composites.

(4) VOC emissions from the catalysts of the open and closed molding operations shall be calculated by using the following equation:

$$E_{cat} = \sum [(G_{cat} * D_{cat} * EF_{cat}) / 2000]$$

Where:

E_{cat} = VOC emissions from catalysts (tons/month)
G_{cat} = gallons of catalysts used per month (gallons/month)
D_{cat} = density of catalysts (pounds/gallon)
EF_{cat} = VOC emission factor of catalysts (weight %)
2000 = conversion factor (pounds/ton)

(5) VOC emissions from the solvents of the open and closed molding operations shall be calculated by using the following equation:

$$E_{sol} = \sum [(G_{sol} * D_{sol} * EF_{sol}) / 2000]$$

Where:

E_{sol} = VOC emissions from solvents (tons/month)
G_{sol} = gallons of solvent used per month (gallons/month)
D_{sol} = density of solvent (pounds/gallon)
EF_{sol} = VOC emission factor of solvent (100%, by weight)
2000 = conversion factor (pounds/ton)

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) gel area (GA) stacks #3 and #4, when the one (1) gel area (GA) is in operation. If a condition exists which should result in a response step, 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.

(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the four (4) paint booths, identified as A, B, C, and D stacks #7, #8, #9, and #10, while one or more of the booths are in operation. If a condition exists which should result in a response step, 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.

(c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) mold shop, MSG, stack MSGS, when the one (1) mold shop (MSG) is in operation. If a condition exists which should result in a response

step, 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) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks SVP2-01, SVP2-02, SVP3-03, SVP2-04, SVP2-05 and SVP2-06, while the processes RTM1 HVLP Gelcoat applicator (RTMG1), the FIT Gelcoat area (P2-01 through P2-07), the RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and the RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5) are in operation. If a condition exists which should result in a response step, 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.

(e) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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.

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

D.1.7 Record Keeping Requirements

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

(1) The VOC content of each gelcoat, resin, paint, coating, catalyst, solvent and adhesive used.

(2) The amount of gel coat, resin, paint, coating, catalyst, solvent and adhesive used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each month.

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

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

Emissions Unit Description:

(s) Two (2) FRP parts trimming booths, identified as TB1 and TB2, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing internal return-air recirculating dust collection system for particulate control;

The trimming booths are equipped with eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws.

Specifically Regulated Insignificant Activities:

(a) Other categories with emissions below insignificant thresholds:

(1) One (1) grinding area, identified as GR, with a maximum capacity of four (4) fiberglass parts per hour, using an internal return-air recirculating dust collection system for particulate control, installed in 1976, and modified in 2014. [326 IAC 6-3-2]

(2) One (1) cut out area, identified as CO, with a maximum capacity of four (4) fiberglass truck toppers per hour, for cutting out windows for truck toppers, using an internal return-air recirculating dust collection system for particulate control, installed in 1976, and modified in 2014. [326 IAC 6-3-2]

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

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM, PM10 and PM2.5 emissions, after control, shall not exceed the pound per hour limits listed in the table below for the following operations:

Emission unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Grinding area (GR)	14.00	14.00	14.00
Cut out area (CO)	14.00	14.00	14.00

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the emission units indicated in the table below shall be limited by the following:

Emissions Units	Maximum Process Weight (tons/hour)	Allowable PM Emission Rate (lbs/hr)
One (1) grinding area (GR) *	0.20	1.39
One (1) cut out area (CO) *	0.20	1.39
Trimming Booth TB1 **	1.50	5.38
Trimming Booth TB2 **		

* Maximum Process Weight (tons/hour) is equal to four (4) fiberglass truck toppers per hour at 100 pounds each.

** Maximum process weight rate is equal to thirty (30) fiberglass parts per hour at 100 pounds each.

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.4 Particulate Control

(a) In order to comply with Conditions D.2.1 and D.2.2, the dust collection systems for particulate control shall be in operation and control emissions from the one (1) grinding area (GR) and the one (1) cut out area (CO) at all times the one (1) grinding area (GR) and the one (1) cut out area (CO) are in operation.

(b) In order to comply with Condition D.2.2, the dust collection systems for particulate control shall be in operation and control emissions from the two (2) FRP parts trimming booths, identified as TB1 and TB2, at all times the two (2) FRP parts trimming booths, identified as TB1 and TB2, are in operation.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) paint booth, identified as A, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #7.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as A, is considered an affected facility.

(f) One (1) paint booth, identified as B, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #8.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as B, is considered an affected facility.

(g) One (1) paint booth, identified as C, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #9.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as C, is considered an affected facility.

(h) One (1) paint booth, identified as D, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #10.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as D, is considered an affected facility.

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

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

Pursuant to 40 CFR 63.4501, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart PPPP in accordance with the schedule in 40 CFR 63, Subpart PPPP.

E.1.2 Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP]

The Permittee which engages in surface coating of plastic parts and products shall comply with the provisions of 40 CFR Part 63, Subpart PPPP, as follows. The full text of Subpart PPPP may be found in Attachment A to this permit.

This source is subject to the following portions of Subpart PPPP:

(1) 40 CFR 63.4480
(2) 40 CFR 63.4481
(3) 40 CFR 63.4482(a), (b), and (e)
(4) 40 CFR 63.4483(b) and (d)
(5) 40 CFR 63.4490(b)
(6) 40 CFR 63.4491(a)

(7) 40 CFR 63.4492(a)
(8) 40 CFR 63.4493(a)
(9) 40 CFR 63.4500(a)(1) and (b)
(10) 40 CFR 63.4501
(11) 40 CFR 63.4510
(12) 40 CFR 63.4520(a)
(13) 40 CFR 63.4530
(14) 40 CFR 63.4531
(15) 40 CFR 63.4540
(16) 40 CFR 63.4541
(17) 40 CFR 63.4542
(18) 40 CFR 63.4580
(19) 40 CFR 63.4581
(20) Table 2 to Subpart PPPP
(21) Table 3 to Subpart PPPP
(22) Table 4 to Subpart PPPP
(23) Appendix A to Subpart PPPP

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a FIT applicator for filled resin, installed in 1976 and modified in 2014, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The FIT applicator used to manufacture filled resin truck covers and the FIT applicator used to manufacture neat resin transportation parts are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of twenty-five (25) fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 and approved in 2014 for modification, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

(c) One (1) high volume, low pressure (HVLP) tooling gel coat applicator booth, identified as MSG for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per hour, approved for construction in 2013, using dry filters for particulate control and exhausting to stack MSGS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling gel coat applicator, identified as MSG, is considered an existing affected facility.

(d) One (1) FIT non-atomizing tooling resin applicator, identified as MSR for mold shop activities, with a maximum capacity of 0.01 fiberglass molds per hour, no control, approved for construction in 2013, and exhausting to stack MSRS.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, subpart WWWW), the tooling resin applicator, identified as MSR, is considered an existing affected facility.

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart

WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

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

E.2.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

E.2.2 Reinforced Plastic Composites Production NESHAP [40 CFR Part 63, Subpart WWWW]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780, which are incorporated by reference as 326 IAC 20-56 for the affected facilities. The full text of Subpart WWWW may be found in Attachment B to this permit.

This source is subject to the following portions of Subpart WWWW:

(1) 40 CFR 63.5785(a)
(2) 40 CFR 63.5790
(3) 40 CFR 63.5795
(4) 40 CFR 63.5800
(5) 40 CFR 63.5805 (b)
(6) 40 CFR 63.5810
(7) 40 CFR 63.5835 (a) and (c)
(8) 40 CFR 63.5840
(9) 40 CFR 63.5860 (a)
(10) 40 CFR 63.5895 (c) and (d)
(11) 40 CFR 63.5900 (a)(2) through (a)(4), (b), and (c)
(12) 40 CFR 63.5905
(13) 40 CFR 63.5910
(14) 40 CFR 63.5915 (a), (c), and (d)
(15) 40 CFR 63.5920
(16) 40 CFR 63.5925
(17) 40 CFR 63.5930
(18) 40 CFR 63.5935
(19) Table 2 to Subpart WWWW
(20) Table 3 to Subpart WWWW
(21) Table 4 to Subpart WWWW
(22) Table 7 to Subpart WWWW
(23) Table 8 to Subpart WWWW
(24) Table 9 to Subpart WWWW
(25) Table 13 to Subpart WWWW
(26) Table 14 to Subpart WWWW
(27) Table 15 to Subpart WWWW
(28) Appendix A to Subpart WWWW

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

Source Name: Composite Technology Assemblies, LLC
Source Address: 904 Markley Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-29072-00023

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: Composite Technology Assemblies, LLC
Source Address: 904 Markley Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-29072-00023

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name:	Composite Technology Assemblies, LLC
Source Address:	904 Markley Drive, Plymouth, Indiana 46563
Part 70 Permit No.:	T099-29072-00023
Facilities:	Chopper area (CA), Gel area (GA), Mold Shop: HVLP tooling gel coat applicator booth (MSG), Mold Shop: FIT non-atomizing tooling resin applicator (MSR), Resin Transfer Molding (RTM1), RTM1 HVLP Gelcoat applicator (RTMG1), FIT Gelcoat area (P2-01 through P2-07), Lamination area, non-atomizing resin applicators (P2-08 through P2-11), HVLP barrier coat resin applicator (P2-12), Resin Transfer Molding (RTM2), RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), Resin Transfer Molding (RTM3), RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5), Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2), Paint Booth A, Paint Booth B, Paint Booth C, Paint Booth D
Parameter:	VOC emissions from the use of all gelcoats, resins, paints, coatings, catalysts, solvents and adhesives from the fiberglass manufacturing and surface coating operations
Limit:	Shall not exceed 249.00 tons per twelve (12) consecutive month period

QUARTER : **YEAR:**

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

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:

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

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

Source Name: Composite Technology Assemblies, LLC
Source Address: 904 Markley Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-29072-00023

Months: _____ to _____ Year: _____

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".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Composite Technology Assemblies, LLC**
Source Location:	**904 Markley Drive, Plymouth, IN 46563**
County:	**Marshall**
SIC Code:	**3089 (Plastics Products, NEC)**
Operation Permit No.:	**T099-29072-00023**
Operation Permit Issuance Date:	**January 14, 2011**
Significant Source Modification No.:	**099-34382-00023**
Significant Permit Modification No.:	**099-34390-00023**
Permit Reviewer:	**Sarah Street**

On April 2, 2014, the Office of Air Quality (OAQ) received an application from Composite Technology Assemblies, LLC related to a modification to an existing stationary fiberglass products manufacturing and painting source.

Note: With this modification, the source is expanding its product line to include other types of fiberglass parts and products and the source description is being updated from "stationary fiberglass truck cover manufacturing and painting source" to "stationary fiberglass products manufacturing and painting source."

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal T099-29072-00023 on January 14, 2011, the source has constructed or has been operating under the following additional approvals:

(a) Minor Source Modification No. 099-32825-00023, issued on April 10, 2013; and

(b) Significant Permit Modification No. 099-32847-00023, issued on June 26, 2013.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

County Attainment Status

The source is located in Marshall County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

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

(b) $PM_{2.5}$
Marshall County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Marshall 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:

Process/ Emission Unit	Potential To Emit of the Entire Source Before Modification (tons/year)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
One (1) chopper area (CA)	-	-	-	-	74.16	-	32.74	32.74 (Styrene)
One (1) gel area (GA)	41.63	41.63	-	-	44.17	-	35.51	35.51 (Styrene)
Four (4) Paint Booths (A, B, C and D)	7.97	7.97	-	-	69.27	-	13.21	4.55 (Xylene)
One (1) grinding area (GR) and one (1) cut out area (CO)	164.25	164.25	-	-	-	-	-	-
One (1) mold shop (MSG and MSR)	1.45	1.45			7.88	-	7.87	7.64 (Styrene)
Total PTE of Entire Source	**215.31**	**215.31**	**-**	**-**	**195.48**	**-**	**89.33**	**35.51 (Styrene)**
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	N/A	N/A

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
Assume PM10= PM2.5

(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 CO2 equivalent emissions (CO2e) 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 the Technical Support Document for Minor Source Modification No. 099-32825-00023, issued on April 10, 2013.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Composite Technology Assemblies, LLC on April 2, 2014, relating to the construction and operation of new closed molding emission units and the modification of an existing gel coat application process.

The following is a list of the new emission unit(s) and pollution control device(s):

(a) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(b) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(c) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(d) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(e) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(f) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(g) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(h) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(i) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(j) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

(k) Two (2) FRP parts trimming booths, identified as TB1 and TB2, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing internal return-air recirculating dust collection system for particulate control;

The trimming booths are equipped with eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws.

(l) Natural gas combustion units, including the following:

(1) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 5.04 MMBtu/hr, utilizing no control, and exhausting indoors;

(2) One (1) air make-up unit, identified as AM2, with a maximum heat input capacity of 2.31 MMBtu/hr, utilizing no control, and exhausting indoors;

(3) One (1) radiant heater, identified as H1, with a maximum heat input capacity of 0.24 MMBtu/hr, utilizing no control, and exhausting indoors;

(4) One (1) radiant heater, identified as H2, with a maximum heat input capacity of 0.125 MMBtu/hr, utilizing no control, and exhausting indoors;

(5) Seventeen (17) radiant heaters, identified as H3 through H19, each with a maximum heat input capacity of 0.01 MMBtu/hr, utilizing no control, and exhausting indoors;

(6) Five (5) forced-air heaters, identified as H20 through H25, each with a maximum heat input capacity of 0.06 MMBtu/hr, utilizing no control, and exhausting indoors;

The following is a list of the modified emission unit(s) and pollution control device(s):

Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a ~~flow coater~~ **FIT applicator** for filled resin, installed in 1976 **and modified in 2014**, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The ~~flow coater,~~ **FIT applicator** ~~which is~~ used to manufacture filled resin truck covers~~,~~ and **the** FIT applicator~~, which is~~ used to manufacture neat resin transportation parts~~,~~ are mutually exclusive operations.

The chopper area has been modified to change the type of application; this change does not change the PTE for this unit.

(b) One (1) gel area, identified as GA, with a maximum capacity of ~~four (4)~~ **twenty-five (25)** fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 **and approved in 2014 for modification**, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

This gel area, identified as GA, is being modified to increase the capacity, as well to change the gel coat material used. In addition the emission factors and PTE calculations are being updated with this modification.

The following is a list of the modified insignificant activities:

Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) Other categories with emissions below insignificant thresholds:

(1) One (1) grinding area, identified as GR, with a maximum capacity of four (4) fiberglass parts per hour, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #5~~**, and modified in 2014**. [326 IAC 6-3-2]

(2) One (1) cut out area, identified as CO, with a maximum capacity of four (4) fiberglass truck toppers per hour, for cutting out windows for truck toppers, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #6~~**, and modified in 2014**. [326 IAC 6-3-2]

The source indicated that the grinding area and the cut out area will be equipped with internal return-air recirculating dust collection systems. These will be baffled collection and control systems which will exhaust back into the grinding and cutting areas. There will be no direct external exhausts serving these areas.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

IDEM has reviewed the PTE calculations submitted by the source and determined them to be complete for the purpose of the proposed modification approval. See Appendix A of this 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.

Process/ Emission Unit	Unlimited PTE of the Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Resin Transfer Molding (RTM1)	0	0	0	0	0	15.45	0	0	15.45	15.45 (Styrene)
RTM1 HVLP Gelcoat applicator (RTMG1)	6.35	6.35	6.35	0	0	33.66	0	0	33.66	33.66 (Styrene)
FIT Gelcoat area (P2-01 through P2-07)	51.43	51.43	51.43	0.00	0.00	114.84	0.00	0	115.36	114.84 (Styrene)
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	0.00	0.00	0.00	0.00	0.00	267.40	0.00	0	267.40	267.40 (Styrene)
HVLP barrier coat resin applicator (P2-12)	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0	0.09	0.09 (Styrene)
Resin Transfer Molding (RTM2)	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45 (Styrene)
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66 (Styrene)
Resin Transfer Molding (RTM3)	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45 (Styrene)
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66 (Styrene)
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	4.04	4.04	4.04	0.00	0.00	8.73	0.00	0	8.73	8.73 (Styrene)
Trimming Booth1 (TB1)	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00
Trimming Booth 2 (TB2)	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.51	0.19	2.95	4,243	0.07	0.06 (Hexane)
Total PTE of Proposed Modification	**79.31**	**79.51**	**79.51**	**0.02**	**3.51**	**538.59**	**2.95**	**4,243**	**538.97**	**538.39 (Styrene)**

Note that the gel area, identified as GA, is being modified to change the materials used, and the PTE calculations are being reevaluated with this modification. The PTE of this emission unit is decreasing; however, the decrease is not accounted for in the above table, which is used to show the PTE of the modification for the purposes of Part 70 permit level determination.

In addition, the PTE of the modified chopper area (CA) is not changing.

See Appendix A for detailed emissions calculations.

(a) Significant Source Modification – approval to construct

This source modification is considered a significant source modification pursuant to 326 IAC 2-7-10.5(g)(4),because the modification has a PTE of PM, PM10, PM2.5 and VOC greater than twenty-five (25) tons per year, each.

In addition, this source modification is considered a significant source modification pursuant to 326 IAC 2-7-10.5(g)(6), because the modification has a PTE greater than 10 tons per year of a single HAP as defined under Section 112(b) of the Clean Air Act.

(b) Significant Permit Modification – approval to operate

This permit modification is considered a significant permit modification, pursuant to 326 IAC 2-7-12(d)(1), because this modification does not qualify as a minor permit modification or administrative amendment, and includes significant changes in existing monitoring Part 70 permit terms and conditions as well as significant changes to reporting or record keeping permit terms and conditions. Further, this modification requires a case-by-case determination of an emission limitation or other standard (e.g. PSD Minor limit).

Permit Level Determination – PSD of the Proposed Modification

See Appendix A for detailed emissions calculations.

This source is an existing Minor Source under PSD Rules. This modification is considered a minor modification under PSD because with the addition of the new lines, the PTE of the entire source is still limited to less than the PSD Major Source Threshold (see table below).

The table below summarizes the potential to emit of the entire source after issuance of this modification, 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 of the Entire Source After Issuance of Modification (tons/year)									
	PM	PM10*	PM2.5*	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Chopper area (CA)	0.00	0.00	0.00	0	0		0	0	32.74	32.74 (Styrene)
Gel area (GA)	5.84	5.84	5.84	0	0		0	0	13.11	13.05 (Styrene)
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	1.45	1.45	1.45	0	0		0	0	2.32	2.10 (Styrene)
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	0	0	0	0	0		0	0	5.54	5.54 (Styrene)
Resin Transfer Molding (RTM1)	0	0	0	0	0		0	0	15.45	15.45 (Styrene)
RTM1 HVLP Gelcoat applicator (RTMG1)	6.35	6.35	6.35	0	0		0	0	33.66	33.66 (Styrene)
FIT Gelcoat area (P2-01 through P2-07)	51.43	51.43	51.43	0	0		0	0	115.36	114.84 (Styrene)
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	0	0	0	0	0		0	0	267.40	267.40 (Styrene)
HVLP barrier coat resin applicator (P2-12)	0	0	0	0	0	249.00 ***	0	0	0.09	0.09 (Styrene)
Resin Transfer Molding (RTM2)	0	0	0	0	0		0	0	15.45	15.45 (Styrene)
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	6.35	6.35	6.35	0	0		0	0	33.66	33.66 (Styrene)
Resin Transfer Molding (RTM3)	0	0	0	0	0		0	0	15.45	15.45 (Styrene)
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	6.35	6.35	6.35	0	0		0	0	33.66	33.66 (Styrene)
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	4.04	4.04	4.04	0.00	0.00		0.00	0	8.73	8.73 (Styrene)
Paint Booth A	1.99	1.99	1.99	0	0		0	0	3.30	1.14 (Xylene)
Paint Booth B	1.99	1.99	1.99	0	0		0	0	3.30	1.14 (Xylene)
Paint Booth C	1.99	1.99	1.99	0	0		0	0	3.30	1.14 (Xylene)
Paint Booth D	1.99	1.99	1.99	0	0		0	0	3.30	1.14 (Xylene)
Trimming Booth1 (TB1)	2.36	2.36	2.36	0	0	0	0	0	0	0
Trimming Booth 2 (TB2)	2.36	2.36	2.36	0	0	0	0	0	0	0
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.51	0.19	2.95	4,243	0.07	0.06 (Hexane)
Insignificant Activities: grinding area (GR), and cut out area (CO) ***	122.64	122.64	122.64	0	0	0	0	0	0	0
Fugitives: Paved roads	negl.	negl.	negl.	0	0	0	0	0	0	0
Total PTE of Entire Source	**217.22**	**217.42**	**217.42**	**0.02**	**3.51**	**249.19**	**2.95**	**4,243**	**605.90**	**591.82 (Styrene)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
***Limits to render 326 IAC 2-2 (PSD) not applicable.

PSD Minor Limits

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(a) PM, PM10, and PM2.5 Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM, PM10 and PM2.5 emissions, after control, shall not exceed the pound per hour limits listed in the table below for the following operations:

Emission unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Grinding area (GR)	14.00	14.00	14.00
Cut out area (CO)	14.00	14.00	14.00

Note: These two operations have significant emissions. Limiting these emission units combined with the unlimited PTE from all other emission units at this source is sufficient to render 326 IAC 2-2 not applicable to the entire source.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) VOC Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total VOC emissions from the use of all gelcoats, resins, paints, coatings, catalysts, solvents and adhesives from the following fiberglass manufacturing and surface coating operations shall not exceed 249.00 tons of per twelve (12) consecutive month period with compliance determined at the end of each month:

Emission unit(s)	VOC Content Limit (tons per year)
Chopper area (CA)	249.00
Gel area (GA)	
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	
Resin Transfer Molding (RTM1)	
RTM1 HVLP Gelcoat applicator (RTMG1)	
FIT Gelcoat area (P2-01 through P2-07)	
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	
HVLP barrier coat resin applicator (P2-12)	
Resin Transfer Molding (RTM2)	
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	
Resin Transfer Molding (RTM3)	
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	
Paint Booth A	
Paint Booth B	
Paint Booth C	
Paint Booth D	

Compliance with this limit, combined with the unlimited potential to emit of VOC from natural gas-fired combustion units, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

Compliance Assurance Monitoring (CAM)

(a) Pursuant to 40 CFR 64.2, CAM is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Emission Unit	Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Gel area (GA)	PM	dry filters	Y	< 100	< 100	100	N	N/A
	PM10	dry filters	Y	< 100	< 100	100	N	N/A
	PM2.5	dry filters	Y	< 100	< 100	100	N	N/A
	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
Resin Transfer Molding (RTM1)	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
RTM1 HVLP Gelcoat applicator (RTMG1)	PM	dry filters	Y	< 100	< 100	100	N	N/A
	PM10	dry filters	Y	< 100	< 100	100	N	N/A
	PM2.5	dry filters	Y	< 100	< 100	100	N	N/A
	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
FIT Gelcoat area (P2-01 through P2-07)	PM	dry filters	Y	< 100	< 100	100	N	N/A
	PM10	dry filters	Y	< 100	< 100	100	N	N/A
	PM2.5	dry filters	Y	< 100	< 100	100	N	N/A
	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
Lamination area, non-atomizing resin applicators (P2-08 through P2-11) *	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
HVLP barrier coat resin applicator (P2-12) *	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						

Emission Unit	Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Resin Transfer Molding (RTM2)	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	PM	dry filters	Y	< 100	< 100	100	N	N/A
	PM10	dry filters	Y	< 100	< 100	100	N	N/A
	PM2.5	dry filters	Y	< 100	< 100	100	N	N/A
	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
Resin Transfer Molding (RTM3)	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	PM	dry filters	Y	< 100	< 100	100	N	N/A
	PM10	dry filters	Y	< 100	< 100	100	N	N/A
	PM2.5	dry filters	Y	< 100	< 100	100	N	N/A
	VOC	N	CAM is not applicable because no control device is used for this unit for these pollutants.					
	HAPs	N						
Trimming Booth1 (TB1)	PM	dust collector	Y	< 100	< 100	100	N	N/A
	PM10	dust collector	Y	< 100	< 100	100	N	N/A
	PM2.5	dust collector	Y	< 100	< 100	100	N	N/A
Trimming Booth 2 (TB2)	PM	dust collector	Y	< 100	< 100	100	N	N/A
	PM10	dust collector	Y	< 100	< 100	100	N	N/A
	PM2.5	dust collector	Y	< 100	< 100	100	N	N/A

Note:
* Although the resin areas (lamination, barrier coat, and tooling booth) [units P2-08 through P2-12] are equipped with dry filters, the transfer efficiency is 100% so there are no particulate emissions to control from these processes

The tanks (Three (3) Polyester Resin Storage Tanks (RT1 through RT3), Mix Tanks (MT1 & MT2), and Two (2) Day Tanks (DT1 & DT2)) do not use control devices; therefore CAM is not applicable.

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

New Source Performance Standards (NSPS):

(b) There are no new NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit due to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(c) This source is still subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63 Subpart WWWW), which is incorporated by reference as 326 IAC 20-56. The new units subject to this rule include the following:

(1) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

(2) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

(3) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

(4) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

(5) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

(6) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

(7) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

(8) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

(9) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

(10) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

The following modified unit is still subject to the requirements of Subpart WWWW:

(1) One (1) gel area, identified as GA, with a maximum capacity of twenty-five (25) fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 and approved in 2014 for modification, and exhausting to stacks #3 and #4.

The entire rule is included as Attachment B of the existing permit. 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.

This source is subject to the following portions of Subpart WWWW:

(1) 40 CFR 63.5785(a)
(2) 40 CFR 63.5790
(3) 40 CFR 63.5795
(4) 40 CFR 63.5800
(5) 40 CFR 63.5805 (b)
(6) 40 CFR 63.5810
(7) 40 CFR 63.5835 (a) and (c)
(8) 40 CFR 63.5840
(9) 40 CFR 63.5860 (a)
(10) 40 CFR 63.5895 (c) and (d)
(11) 40 CFR 63.5900 (a)(2) through (a)(4), (b), and (c)
(12) 40 CFR 63.5905
(13) 40 CFR 63.5910
(14) 40 CFR 63.5915 (a), (c), and (d)
(15) 40 CFR 63.5920
(16) 40 CFR 63.5925
(17) 40 CFR 63.5930
(18) 40 CFR 63.5935
(19) Table 2 to Subpart WWWW
(20) Table 3 to Subpart WWWW
(21) Table 4 to Subpart WWWW
(22) Table 7 to Subpart WWWW
(23) Table 8 to Subpart WWWW
(24) Table 9 to Subpart WWWW
(25) Table 13 to Subpart WWWW
(26) Table 14 to Subpart WWWW
(27) Table 15 to Subpart WWWW
(28) Appendix A to Subpart WWWW

Note: There are no applicable testing requirements included in this NESHAP for the new and modified emission units. The source will demonstrate compliance by using the weighted average emission limit option in 40 CFR Part 63.5810(c).

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).

(d) There are no new NESHAPs included in the permit (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) due to this proposed modification.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the Permit Level Determination – PSD of the Proposed Modification section.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 40 CFR 63.41 (Subpart B) [326 IAC 2-4.1-1(c)], this rule applies to a source that installs at any developed site a new process or production unit which in and of itself emits or has the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAP. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this source is specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which were issued pursuant to Section 112(d) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

(c) 326 IAC 5-1 (Opacity Limitations)
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:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(d) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired combustion units are not subject to 326 IAC 6-2, because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

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

(1) Pursuant to 326 IAC 6-3-2(d), the particulate from the following activities shall be controlled by dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control devices in accordance with manufacturer specifications:

(A) Gel area (GA),
(B) RTM1 HVLP Gelcoat applicator (RTMG1),
(C) FIT Gelcoat area (P2-01 through P2-07),
(D) RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and
(E) RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5).

(2) The two (2) FRP parts trimming booths, identified as TB1 and TB2, are subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter emissions from the two (2) FRP parts trimming booths, identified as TB1 and TB2 (consisting of eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws), shall not exceed the emission rate listed in the table below:

Emissions Units	Maximum Process Weight (tons/hour) *	Allowable PM Emission Rate (lbs/hr)
Trimming Booth TB1	1.50	5.38
Trimming Booth TB2		

* Maximum process weight rate is equal to thirty (30) fiberglass parts per hour at 100 pounds each.

= 30 parts/hour * 100 lbs/part / 2,000 lbs/ton
= 1.5 tons/hour

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds

per hour shall be accomplished by use of the equation:

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

Based upon Appendix A, the uncontrolled PM emission rate from the two (2) FRP parts trimming booths, identified as TB1 and TB2, is 1.08 lbs/hr. Therefore, the trimming booths can comply with the PM emission limit above before the use of a control device.

(3) The following new and modified operations do not emit particulate matter and are therefore not subject to the requirements of 326 IAC 6-3:

(A) Resin Transfer Molding (RTM1),
(B) Lamination area, non-atomizing resin applicators (P2-08 through P2-11),
(C) HVLP barrier coat resin applicator (P2-12),
(D) Resin Transfer Molding (RTM2), and
(E) Resin Transfer Molding (RTM3).

(4) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential PM emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule. Each of the tanks (RT1, RT2, RT3, MT1, MT2, DT1 and DT2) has potential PM emissions less than 0.551 pounds per hour (see Appendix A). Therefore, these emission units are exempt from the requirements of this rule.

(5) The natural gas-combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(f) 326 IAC 8-1-6 (New facilities; general reduction requirements)

(1) The modification of the gel area, identified as GA, will cause the gel area to be considered a new facility. This gel area, identified as GA, is subject to 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(c)(3), new facilities that are regulated by 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to the gel area, identified as GA.

(2) The following new facilities have potential VOC emissions less than 25 tons per year:

(A) Resin Transfer Molding (RTM1),
(B) Resin Transfer Molding (RTM2),
(C) Resin Transfer Molding (RTM3), and
(D) Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2).

In addition, these emission units are subject to 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(c)(3), new facilities that are regulated by 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to resing transfer molding operations RTM1, RTM2, and RTM3 and the tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2).

(3) The following new facilities have potential VOC emissions greater than 25 tons per year:

(A) RTM1 HVLP Gelcoat applicator (RTMG1),
(B) FIT Gelcoat area (P2-01 through P2-07),
(C) Lamination area, non-atomizing resin applicators (P2-08 through P2-11),
(D) RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and
(E) RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5).

However, these emission units are subject to 326 IAC 20-56. Pursuant to 326 IAC 8-1-

6(c)(3), new facilities that are regulated by 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these new facilities.

(g) 326 IAC 8-2 (Surface Coating Emission Limitations)
The new and modified operations do not perform any of the activities identified in 326 IAC 8-2. Therefore, the requirements of 326 IAC 8-2 do not apply to these emission units.

(h) 326 IAC 8 Rules (VOCs)
There are no VOC Rules that apply to this modification.

(i) 326 IAC 20-56 (Reinforced Plastic Composites Production)
Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following 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 subdivision (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.

Compliance Determination, Monitoring and Testing 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.

(a) There compliance determination and monitoring requirements applicable to this proposed modification are specified in the table below:

(1) Particulate

Emission Unit/Control	Operating Parameters	Frequency
Dry filters *	Daily Filter Checks	Once per day
	Overspray Observations	Once per week
	Stack Exhaust Inspections	Once per month

* The following emission units are equipped with dry filters necessary for particulate emissions control: Gel area (GA), RTM1 HVLP Gelcoat applicator (RTMG1), FIT Gelcoat area (P2-01 through P2-07), RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5).

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Note: The existing monitoring conditions for the grinding area (GR) and cut out area (CO) are being removed because these units are now equipped with internal return-air recirculating dust collection systems for particulate control. Because these systems have no external exhausts, the visible emissions notations requirement will be removed.

The trimming booths (TB1 and TB2) are able to comply with the 326 IAC 6-3-2 PM limits without the use of control. However, potential emissions are estimated using the control device specifications (see Appendix A). Therefore, these control devices will be required to operate while the trimming booths (TB1 and TB2) are in operation.

(2) VOC

Compliance with the source-wide VOC usage limitation, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, shall be determined:

(A) For Paint Booths A-D: pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(B) For the open and closed molding operations: by calculating VOC emissions using equations, with emission factors from the Unified Emission Factors for Open

Molding of Composites and Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2.

(b) There are no testing requirements applicable to this proposed modification.

The PM, PM10, and PM2.5 PSD Minor limits are required for the existing grinding area (GR), and cut out area (CO). These emission units are equipped with control devices and are able to comply with the pound per hour limits using only a 25% control efficiency (see Appendix A). Therefore, no testing will be required at this time to ensure compliance with the particulate limits specified to render the requirements of 326 IAC 2-2- (PSD) not applicable.

Proposed Changes

(a) The following changes listed below are due to the proposed revision:

(1) Section A.1 has been updated with the new source description.

(2) Sections A.2 - Emission Units and Pollution Control Equipment Summary and A.3 - Specifically Regulated Insignificant Activities have been updated with the new and modified emission units with this proposed modification.

(3) Section D.1 has been updated with the new and modified emission units.

(4) Condition D.1.1 has been added for the VOC PSD Minor limit.

(5) Existing conditions in Section D.1 have been renumbered.

(6) The applicable compliance determination, monitoring, record keeping and reporting requirements to the modification have been added in Conditions D.1.5, D.1.6, D.1.7, and D.1.8.

(7) Section D.2 has been updated with the emission units.

(8) Condition D.2.1 has been added for the PSD Minor limits.

(9) Existing conditions in Section D.2 have been renumbered.

(10) Condition D.2.2 has been revised to add new particulate limits.

(11) Section D.2.4 - Particulate Control has been added.

(12) Section D.2 has been updated with the new and modified emission units.

(13) Section E.2 has been updated with the new and modified emission units.

(14) A reporting form has been added at the end of the permit to correspond to Condition D.1.8.

(15) The Table of Contents has been updated with the changes as described above.

(b) IDEM, OAQ has also decided to make the following changes to the permit:

(1) IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

(2) IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

(3) IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.

Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

...

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 ~~truck cover~~ **products** manufacturing and painting source.

...

A.2 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a ~~flow coater~~ **FIT applicator** for filled resin, installed in 1976 **and modified in 2014**, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The ~~flow coater,~~ **FIT applicator** ~~which is~~ used to manufacture filled resin truck covers~~,~~ and **the** FIT applicator~~, which is~~ used to manufacture neat resin transportation parts~~,~~ are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of ~~four (4)~~ **twenty-five (25)** fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 **and approved in 2014 for modification**, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

...

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

(s) Two (2) FRP parts trimming booths, identified as TB1 and TB2, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing internal return-air recirculating dust collection system for particulate control;

The trimming booths are equipped with eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws.

(t) Natural gas combustion units, including the following:

(1) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 5.04 MMBtu/hr, utilizing no control, and exhausting indoors;

(2) One (1) air make-up unit, identified as AM2, with a maximum heat input capacity of 2.31 MMBtu/hr, utilizing no control, and exhausting indoors;

(3) One (1) radiant heater, identified as H1, with a maximum heat input capacity of 0.24 MMBtu/hr, utilizing no control, and exhausting indoors;

(4) One (1) radiant heater, identified as H2, with a maximum heat input capacity of 0.125 MMBtu/hr, utilizing no control, and exhausting indoors;

(5) Seventeen (17) radiant heaters, identified as H3 through H19, each with a maximum heat input capacity of 0.01 MMBtu/hr, utilizing no control, and exhausting indoors;

(6) Five (5) forced-air heaters, identified as H20 through H25, each with a maximum heat input capacity of 0.06 MMBtu/hr, utilizing no control, and exhausting indoors.

...

A.3 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) Other categories with emissions below insignificant thresholds:

(1) One (1) grinding area, identified as GR, with a maximum capacity of four (4) fiberglass parts per hour, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #5~~**, and modified in 2014**. [326 IAC 6-3-2]

(2) One (1) cut out area, identified as CO, with a maximum capacity of four (4) fiberglass truck toppers per hour, for cutting out windows for truck toppers, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #6~~**, and modified in 2014**. [326 IAC 6-3-2]

...

C.9 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:

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).

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

...

C.10 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.

...

C.16 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.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a ~~flow coater~~ **FIT applicator** for filled resin, installed in 1976 **and modified in 2014**, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The ~~flow coater,~~ **FIT applicator** ~~which is~~ used to manufacture filled resin truck covers~~,~~ and **the** FIT applicator~~, which is~~ used to manufacture neat resin transportation parts~~,~~ are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of ~~four (4)~~ **twenty-five (25)** fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 **and approved in 2014 for modification**, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

...

~~(g)~~**(h)** One (1) paint booth, identified as D, with a maximum capacity of one (1) fiberglass parts per hour, equipped with high volume, low pressure (HVLP) spray guns, using dry filters for particulate control, installed in 1987, and exhausting to stack #10.

Under NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP), the paint booth, identified as D, is considered an affected facility.

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total VOC emissions from the use of all gelcoats, resins, paints,

coatings, catalysts, solvents and adhesives from the following fiberglass manufacturing and surface coating operations shall not exceed 249.00 tons of per twelve (12) consecutive month period with compliance determined at the end of each month:

Emission unit(s)	VOC Content Limit (tons per year)
Chopper area (CA)	249.00
Gel area (GA)	
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	
Resin Transfer Molding (RTM1)	
RTM1 HVLP Gelcoat applicator (RTMG1)	
FIT Gelcoat area (P2-01 through P2-07)	
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	
HVLP barrier coat resin applicator (P2-12)	
Resin Transfer Molding (RTM2)	
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	
Resin Transfer Molding (RTM3)	
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	
Paint Booth A	
Paint Booth B	
Paint Booth C	
Paint Booth D	

Compliance with this limit, combined with the unlimited potential to emit of VOC from natural gas-fired combustion units, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.~~1~~**2** Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) gel area, identified as GA, the four (4) paint booths, identified as A, B, C and D, ~~and~~ the Mold Shop activities from MSG, **the RTM1 HVLP Gelcoat applicator (RTMG1), the FIT Gelcoat area (P2-01 through P2-07), the RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and the RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)** shall each be controlled by dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control devices in accordance with manufacturer specifications.

D.1.~~2~~**3** Operator Training [326 IAC 20-56-2]

...

D.1.~~3~~**4** Preventive Maintenance Plan [326 IAC 1-6-3]

...

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC emission limitation contained in Condition D.1.1 for the Paint Booth A, Paint Booth B, Paint Booth C, and Paint Booth D shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The Permittee shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst, solvent and mold release agent used in the open and closed molding operations.

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows for the following open and closed molding operations:

Chopper area (CA)
Gel area (GA)
Mold Shop: HVLP tooling gel coat applicator booth (MSG)
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)
Resin Transfer Molding (RTM1, RTM2, and RTM3)
HVLP Gelcoat applicators (RTMG1, RTMG2, RTMG3, RTMG4, and RTMG5)
FIT Gelcoat area (P2-01 through P2-07)
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)
HVLP barrier coat resin applicator (P2-12)
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)

(1) Monthly VOC emissions of the open and closed molding operations shall be calculated with the following equation:

$$E_{VOC} = \sum [E_{gelcoat} + E_{resin} + E_{cat} + E_{sol}]$$

Where:

E_{VOC} = VOC emissions from open and closed molding operations (tons/month)
$E_{gelcoat}$ = VOC emissions from gel coats of open and closed molding operations (tons/month)
E_{resin} = VOC emissions from resins of the open and closed molding operations (tons/month)
E_{cat} = VOC emissions from catalysts of the open and closed molding operations (tons/month)
E_{sol} = VOC emissions from all other solvents (tons/month)

(2) VOC emissions from the gel coats of the open and closed molding operations shall be calculated by multiplying the monthly usage of each gel coat by the emission factor provided in the Unified Emission Factors for Open Molding of Composites, using the following equation:

$$E_{gelcoat} = \sum [(G_{gelcoat} * D_{gelcoat} * EF) / 2000]$$

Where:

$E_{gelcoat}$ = VOC emissions from gel coats (tons/month)
$G_{gelcoat}$ = gallons of gel coat used per month (gallons/month)
$D_{gelcoat}$ = density of gel coat (pounds/gallon)
EF = VOC Emission factor of the gel coat (weight %), or

VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Unified Emission Factors for Open Molding of Composites.

(3) VOC emissions from the resins of the open and closed molding operations shall be calculated by multiplying the monthly usage of each resin by the emission factor provided in "Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2" for closed molding operations and the Unified Emission Factors for Open Molding of Composites for close molding operations, using the following equation:

$$E_{resin} = \sum [(G_{resin} * D_{resin} * EF) / 2000]$$

Where:

E_{resin} = VOC emissions from resins (tons/month)
G_{resin} = gallons of resin used per month (gallons/month)
D_{resin} = density of resin (pounds/gallon)
EF = VOC Emission factor of the resin (weight %), or
VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2 and the Unified Emission Factors for Open Molding of Composites.

(4) VOC emissions from the catalysts of the open and closed molding operations shall be calculated by using the following equation:

$$E_{cat} = \sum [(G_{cat} * D_{cat} * EF_{cat}) / 2000]$$

Where:

E_{cat} = VOC emissions from catalysts (tons/month)
G_{cat} = gallons of catalysts used per month (gallons/month)
D_{cat} = density of catalysts (pounds/gallon)
EF_{cat} = VOC emission factor of catalysts (weight %)
2000 = conversion factor (pounds/ton)

(5) VOC emissions from the solvents of the open and closed molding operations shall be calculated by using the following equation:

$$E_{sol} = \sum [(G_{sol} * D_{sol} * EF_{sol}) / 2000]$$

Where:

E_{sol} = VOC emissions from solvents (tons/month)
G_{sol} = gallons of solvent used per month (gallons/month)
D_{sol} = density of solvent (pounds/gallon)
EF_{sol} = VOC emission factor of solvent (100%, by weight)
2000 = conversion factor (pounds/ton)

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

D.1.~~4~~**6** Monitoring

...

(d) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks SVP2-01, SVP2-02, SVP3-03, SVP2-04, SVP2-05 and SVP2-06, while the processes RTM1 HVLP Gelcoat applicator (RTMG1), the FIT Gelcoat area (P2-01 through P2-07), the RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), and the RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5) are in operation. If a condition exists which should result in a response step, 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)~~**(e)** Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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.

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

D.1.~~5~~**7** Record Keeping Requirements

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

(1) The VOC content of each gelcoat, resin, paint, coating, catalyst, solvent and adhesive used.

(2) The amount of gel coat, resin, paint, coating, catalyst, solvent and adhesive used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each month.

~~(a)~~**(b)** To document the compliance status with Condition D.1.~~4~~**6**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

~~(b)~~**(c)** Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

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

Emissions Unit Description:

(s) Two (2) FRP parts trimming booths, identified as TB1 and TB2, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing internal return-air recirculating dust collection system for particulate control;

The trimming booths are equipped with eight (8) hand grinders, six (6) hand saws, and three (3) stationary saws.

Specifically Regulated Insignificant Activities:

(a) Other categories with emissions below insignificant thresholds:

(1) One (1) grinding area, identified as GR, with a maximum capacity of four (4) fiberglass parts per hour, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #5~~**, and modified in 2014**. [326 IAC 6-3-2]

(2) One (1) cut out area, identified as CO, with a maximum capacity of four (4) fiberglass truck toppers per hour, for cutting out windows for truck toppers, using ~~dry filters~~ **an internal return-air recirculating dust collection system** for particulate control, installed in 1976~~, and exhausting to stack #6~~**, and modified in 2014**. [326 IAC 6-3-2]

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

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM, PM10 and PM2.5 emissions, after control, shall not exceed the pound per hour limits listed in the table below for the following operations:

Emission unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Grinding area (GR)	14.00	14.00	14.00
Cut out area (CO)	14.00	14.00	14.00

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.~~1~~**2** Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the ~~one (1) grinding area, identified as GR, and the (1) cut out area, identified as CO,~~ **emission units indicated in the table below** shall be limited by the following:

Emissions Units	Maximum Process Weight (tons/hour)	Allowable PM Emission Rate (lbs/hr)
One (1) grinding area (GR) *	**0.20**	**1.39**
One (1) cut out area (CO) *	**0.20**	**1.39**
Trimming Booth TB1 **	**1.50**	**5.38**
Trimming Booth TB2 **		

***** **Maximum Process Weight (tons/hour) is equal to four (4) fiberglass truck toppers per hour at 100 pounds each.**

****** **Maximum process weight rate is equal to thirty (30) fiberglass parts per hour at 100 pounds each.**

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

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

~~Emissions Units~~	~~Maximum Process Weight (tons/hour)[1] for each unit of that type~~	~~326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type~~
~~One (1) grinding area (GR)~~	~~0.20~~	~~1.39~~
~~One (1) cut out area (CO)~~	~~0.20~~	~~1.39~~

~~[1] Maximum Process Weight (tons/hour) is equal to four (4) fiberglass truck toppers per hour at 100 pounds each.~~

D.2.~~2~~**3** Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.4 Particulate Control

(a) In order to comply with Conditions D.2.1 and D.2.2, the dust collection systems for particulate control shall be in operation and control emissions from the one (1) grinding area (GR) and the one (1) cut out area (CO) at all times the one (1) grinding area (GR) and the one (1) cut out area (CO) are in operation.

(b) In order to comply with Condition D.2.2, the dust collection systems for particulate control shall be in operation and control emissions from the two (2) FRP parts

trimming booths, identified as TB1 and TB2, at all times the two (2) FRP parts trimming booths, identified as TB1 and TB2, are in operation.

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

~~D.2.5 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the grinding area (GR) stack exhaust (stack #5) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) Daily visible emission notations of the cut out area (CO) stack exhaust (stack #6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(c) 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.~~

~~(d) 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.~~

~~(e) 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.~~

~~(f) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

~~D.2.6 Filter Inspections~~

~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling the grinding area (GR) and the cut out area (CO). All defective filters shall be replaced.~~

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

~~D.2.5 Record Keeping Requirements~~

~~(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of stack exhausts #5 and #6. 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 Condition D.2.4, the Permittee shall maintain a log of the daily inspections.~~

~~(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.~~

…

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) chopper area, identified as CA, with a maximum capacity of four (4) fiberglass parts per hour, equipped with the following, no control and exhausting to stacks #1 and #2:

(1) a ~~flow coater~~ **FIT applicator** for filled resin, installed in 1976 **and modified in 2014**, which is used to manufacture filled resin truck covers, and

(2) a FIT applicator for neat resin, identified as CANRA, approved for construction in 2013, which is used to manufacture neat resin transportation parts.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the chopper area, identified as CA, is considered an affected facility.

Note: The ~~flow coater,~~ **FIT applicator** ~~which is~~ used to manufacture filled resin truck covers~~,~~ and **the** FIT applicator~~, which is~~ used to manufacture neat resin transportation parts~~,~~ are mutually exclusive operations.

(b) One (1) gel area, identified as GA, with a maximum capacity of ~~four (4)~~ **twenty-five (25)** fiberglass parts per hour, equipped with airless spray guns, using dry filters for particulate control, installed in 1976 **and approved in 2014 for modification**, and exhausting to stacks #3 and #4.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel area, identified as GA, is considered an affected facility.

...

(i) One (1) resin transfer molding applicator, identified as RTM1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicator, identified as RTM1, is considered an affected facility.

(j) One (1) HVLP gel coat applicator, identified as RTMG1, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVRTMG1.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicator, identified as RTMG1, is considered an affected facility.

(k) Seven (7) FIT gel coat applicators, identified as P2-01 through P2-07, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the gel coat applicators, identified as P2-01 through P2-07, are considered affected facilities.

(l) Four (4) non-atomizing resin applicators, identified as P2-08 through P2-11, approved in 2014 for construction, with a combined maximum capacity of 30 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stacks SVP2-02 through SVP2-04.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the non-atomizing resin applicators, identified as P2-08 through P2-11, are considered affected facilities.

(m) One (1) HVLP barrier coat resin applicator, identified as P2-12, approved in 2014 for construction, with a maximum capacity of 10 fiberglass parts per hour, utilizing dry filters for particulate control, and exhausting to stack SVP2-01.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP barrier coat resin applicator, identified as P2-12, is considered an affected facility.

(n) Two (2) resin transfer molding applicators, identified as RTM2 and RTM3, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, utilizing no control, and exhausting indoors.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the resin transfer molding applicators, identified as RTM2 and RTM3, are considered affected facilities.

(o) Five (5) HVLP gel coat applicators, identified as RTMG1 through RTMG5, approved in 2014 for construction, with a maximum capacity of 8 fiberglass parts per hour, each, utilizing dry filters for particulate control, and exhausting to stacks SVP2-05 and SVP2-06.

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the HVLP gel coat applicators, identified as RTMG1 through RTMG5, are considered affected facilities.

(p) Three (3) bulk resin tanks, identified as RT1, RT2, and RT3, approved in 2014 for construction, with a maximum capacity of 2,200 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the bulk resin tanks, identified as RT1, RT2, and RT3, are considered affected facilities.

(q) Two (2) mix tanks, identified as MT1 and MT2, approved in 2014 for construction, with a maximum capacity of 800 gallons each, with a maximum throughput of 5,314 tons of filler and powder per year, each, utilizing no control, and exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the mix tanks, identified as MT1 and MT2, are considered affected facilities.

(r) Two (2) day tanks, identified as DT1 and DT2, approved in 2014 for construction, with a maximum capacity of 500 gallons each, exhausting inside the building;

Under the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), the day tanks, identified as DT1 and DT2, are considered affected facilities.

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

E.2.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the ~~chopper area, gel area and mold shop, identified as CA, GA, MSG and MSR~~ **affected facilities** as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

E.2.2 Reinforced Plastic Composites Production NESHAP [40 CFR Part 63, Subpart WWWW]

Pursuant to CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of 40 CFR Part 63.5780, which are incorporated by reference as 326 IAC 20-56 for the ~~chopper area, gel area and mold shop identified as CA, GA, MSG and MSR~~ **affected facilities**. The full text of Subpart WWWW may be found in Attachment B to this permit.

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

Part 70 Quarterly Report

Source Name:	**Composite Technology Assemblies, LLC**
Source Address:	**904 Markley Drive, Plymouth, Indiana 46563**
Part 70 Permit No.:	**T099-29072-00023**
Facilities:	**Chopper area (CA), Gel area (GA), Mold Shop: HVLP tooling gel coat applicator booth (MSG), Mold Shop: FIT non-atomizing tooling resin applicator (MSR), Resin Transfer Molding (RTM1), RTM1 HVLP Gelcoat applicator (RTMG1), FIT Gelcoat area (P2-01 through P2-07), Lamination area, non-atomizing resin applicators (P2-08 through P2-11), HVLP barrier coat resin applicator (P2-12), Resin Transfer Molding (RTM2), RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3), Resin Transfer Molding (RTM3), RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5), Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2), Paint Booth A, Paint Booth B, Paint Booth C, Paint Booth D**
Parameter:	**VOC emissions from the use of all gelcoats, resins, paints, coatings, catalysts, solvents and adhesives from the fiberglass manufacturing and surface coating operations**
Limit:	**Shall not exceed 249.00 tons per twelve (12) consecutive month period**

QUARTER : **YEAR:**

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

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:

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

...

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 099-34382-00023 and Significant Permit Modification No. 099-34390-00023. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Appendix A: Emissions Calculations
PTE Summary

Company Name: Composite Technology Assemblies, LLC
Address City IN Zip: 904 Markley Road, Plymouth, Indiana 46563
Significant Source Modification Number: 099-34382-00023
Significant Permit Modification Number: 099-34390-00023
Reviewer: Sarah Street

	Unlimited Potential to Emit (tons/yr)										
Emission Unit(s)	**PM**	**PM10**	**PM2.5**	**SO_2**	**NOx**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Worst Case Single HAP**	
Chopper area (CA)	0.00	0.00	0.00	0.00	0.00	74.16	0.00	0	32.74	32.74	Styrene
Gel area (GA) *	5.84	5.84	5.84	0.00	0.00	13.05	0.00	0	13.11	13.05	Styrene
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	1.45	1.45	1.45	0.00	0.00	2.32	0.00	0	2.32	2.10	Styrene
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	0.00	0.00	0.00	0.00	0.00	5.55	0.00	0	5.54	5.54	Styrene
Resin Transfer Molding (RTM1) **	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45	Styrene
RTM1 HVLP Gelcoat applicator (RTMG1) **	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66	Styrene
FIT Gelcoat area (P2-01 through P2-07) **	51.43	51.43	51.43	0.00	0.00	114.84	0.00	0	115.36	114.84	Styrene
Lamination area, non-atomizing resin applicators (P2-08 through P2-11) **	0.00	0.00	0.00	0.00	0.00	267.40	0.00	0	267.40	267.40	Styrene
HVLP barrier coat resin applicator (P2-12) **	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0	0.09	0.09	Styrene
Resin Transfer Molding (RTM2) **	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45	Styrene
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3) **	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66	Styrene
Resin Transfer Molding (RTM3) **	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45	Styrene
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5) **	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66	Styrene
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	4.04	4.04	4.04	0.00	0.00	8.73	0.00	0	8.73	8.73	Styrene
Paint Booth A	1.99	1.99	1.99	0.00	0.00	17.32	0.00	0	3.30	1.14	Xylene
Paint Booth B	1.99	1.99	1.99	0.00	0.00	17.32	0.00	0	3.30	1.14	Xylene
Paint Booth C	1.99	1.99	1.99	0.00	0.00	17.32	0.00	0	3.30	1.14	Xylene
Paint Booth D	1.99	1.99	1.99	0.00	0.00	17.32	0.00	0	3.30	1.14	Xylene
Trimming Booth 1 (TB1) **	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	
Trimming Booth 2 (TB2) **	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	
Natural Gas Combustion **	0.07	0.27	0.27	0.02	3.51	0.19	2.95	4,243	0.07	0.06	Hexane
Insignificant Activities: grinding area (GR), and cut out area (CO)	164.25	164.25	164.25	0.00	0.00	0.00	0.00	0	0.00	0.00	
Fugitives: Paved roads	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0	0.00	0.00	
Source-wide Total	**258.83**	**259.03**	**259.03**	**0.02**	**3.51**	**702.94**	**2.95**	**4,243**	**605.90**	**591.82**	**Styrene**

* Approved in 2014 for modification with this Significant Source Modification No. 099-34382-00023
** Approved in 2014 for construction with this Significant Source Modification No. 099-34382-00023

	Limited Potential to Emit (tons/yr)										
Emission Unit(s)	**PM**	**PM10**	**PM2.5**	**SO_2**	**NOx**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Worst Case Single HAP**	
Chopper area (CA)	0.00	0.00	0.00	0.00	0.00	< 249.00 ****	0.00	0	32.74	32.74	Styrene
Gel area (GA) *	5.84	5.84	5.84	0.00	0.00		0.00	0	13.11	13.05	Styrene
Mold Shop: HVLP tooling gel coat applicator booth (MSG)	1.45	1.45	1.45	0.00	0.00		0.00	0	2.32	2.10	Styrene
Mold Shop: FIT non-atomizing tooling resin applicator (MSR)	0.00	0.00	0.00	0.00	0.00		0.00	0	5.54	5.54	Styrene
Resin Transfer Molding (RTM1) **	0.00	0.00	0.00	0.00	0.00		0.00	0	15.45	15.45	Styrene
RTM1 HVLP Gelcoat applicator (RTMG1) **	6.35	6.35	6.35	0.00	0.00		0.00	0	33.66	33.66	Styrene
FIT Gelcoat area (P2-01 through P2-07) **	51.43	51.43	51.43	0.00	0.00		0.00	0	115.36	114.84	Styrene
Lamination area, non-atomizing resin applicators (P2-08 through P2-11) **	0.00	0.00	0.00	0.00	0.00		0.00	0	267.40	267.40	Styrene
HVLP barrier coat resin applicator (P2-12) **	0.00	0.00	0.00	0.00	0.00		0.00	0	0.09	0.09	Styrene
Resin Transfer Molding (RTM2) **	0.00	0.00	0.00	0.00	0.00		0.00	0	15.45	15.45	Styrene
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3) **	6.35	6.35	6.35	0.00	0.00		0.00	0	33.66	33.66	Styrene
Resin Transfer Molding (RTM3) **	0.00	0.00	0.00	0.00	0.00		0.00	0	15.45	15.45	Styrene
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5) **	6.35	6.35	6.35	0.00	0.00		0.00	0	33.66	33.66	Styrene
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	4.04	4.04	4.04	0.00	0.00		0.00	0.00	8.73	8.73	Styrene
Paint Booth A	1.99	1.99	1.99	0.00	0.00		0.00	0	3.30	1.14	Xylene
Paint Booth B	1.99	1.99	1.99	0.00	0.00		0.00	0	3.30	1.14	Xylene
Paint Booth C	1.99	1.99	1.99	0.00	0.00		0.00	0	3.30	1.14	Xylene
Paint Booth D	1.99	1.99	1.99	0.00	0.00		0.00	0	3.30	1.14	Xylene
Trimming Booth 1 (TB1) **	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	
Trimming Booth 2 (TB2) **	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	
Natural Gas Combustion **	0.07	0.27	0.27	0.02	3.51	0.19	2.95	4,243	0.07	0.06	Hexane
Insignificant Activities: grinding area (GR), and cut out area (CO) ***	122.64	122.64	122.64	0.00	0.00	0.00	0.00	0	0.00	0.00	
Fugitives: Paved roads	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0	0.00	0.00	
Source-wide Total	**217.22**	**217.42**	**217.42**	**0.02**	**3.51**	**249.19**	**2.95**	**4,243**	**605.90**	**591.82**	**Styrene**

* Approved in 2014 for modification with this Significant Source Modification No. 099-34382-00023
** Approved in 2014 for construction with this Significant Source Modification No. 099-34382-00023
*** PM, PM10, PM2.5 limited to render the requirements of 326 IAC 2-2 not applicable
**** VOC limited to less than 250 tons per year to render the requirements of 326 IAC 2-2 not applicable

Appendix A: Emissions Calculations
PTE Summary of Modification

Company Name: Composite Technology Assemblies, LLC
Address City IN Zip: 904 Markley Road, Plymouth, Indiana 46563
Significant Source Modification Number: 099-34382-00023
Significant Permit Modification Number: 099-34390-00023
Reviewer: Sarah Street

	Unlimited Potential to Emit (tons/yr)										
Emission Unit(s)	**PM**	**PM10**	**PM2.5**	**SO_2**	**NOx**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Worst Case Single HAP**	
Modified Unit											
Gel area (GA) (Before Modification) *	41.63	41.63	41.63	0	0	44.17	0	0	35.51	35.51	Styrene
Gel area (GA) (After Modification)	5.84	5.84	5.84	0.00	0.00	13.05	0.00	0	13.11	13.05	Styrene
Difference in PTE After Modification	**-35.79**	**-35.79**	**-35.79**	**0.00**	**0.00**	**-31.12**	**0.00**	**0**	**-22.40**	**-22.46**	**Styrene**

* These emissions are based upon the Technical Support Document for Minor Source Modification No. 099-32825-00023, issued on April 10, 2013

	Unlimited Potential to Emit (tons/yr)										
Emission Unit(s)	**PM**	**PM10**	**PM2.5**	**SO_2**	**NOx**	**VOC**	**CO**	**GHGs as CO2e**	**Total HAPs**	**Worst Case Single**	
New Emission Units											
Resin Transfer Molding (RTM1)	0	0	0	0	0	15.45	0	0	15.45	15.45	Styrene
RTM1 HVLP Gelcoat applicator (RTMG1)	6.35	6.35	6.35	0	0	33.66	0	0	33.66	33.66	Styrene
FIT Gelcoat area (P2-01 through P2-07)	51.43	51.43	51.43	0.00	0.00	114.84	0.00	0	115.36	114.84	Styrene
Lamination area, non-atomizing resin applicators (P2-08 through P2-11)	0.00	0.00	0.00	0.00	0.00	267.40	0.00	0	267.40	267.40	Styrene
HVLP barrier coat resin applicator (P2-12)	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0	0.09	0.09	Styrene
Resin Transfer Molding (RTM2)	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45	Styrene
RTM2 HVLP Gelcoat applicators (RTMG2, RTMG3)	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66	Styrene
Resin Transfer Molding (RTM3)	0.00	0.00	0.00	0.00	0.00	15.45	0.00	0	15.45	15.45	Styrene
RTM3 HVLP Gelcoat applicators (RTMG4, RTMG5)	6.35	6.35	6.35	0.00	0.00	33.66	0.00	0	33.66	33.66	Styrene
Tanks (RT1 through RT3, MT1 & MT2, DT1 & DT2)	4.04	4.04	4.04	0.00	0.00	8.73	0.00	0	8.73	8.73	Styrene
Trimming Booth 1 (TB1)	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	0.00
Trimming Booth 2 (TB2)	2.36	2.36	2.36	0.00	0.00	0.00	0.00	0	0.00	0.00	0.00
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.51	0.19	2.95	4,243	0.07	0.06	Hexane
PTE of New Emission Units	**79.31**	**79.51**	**79.51**	**0.02**	**3.51**	**538.59**	**2.95**	**4,243**	**538.97**	**538.39**	**Styrene**

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations
Chopper Area

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Potential HAP as Styrene (tons per year)	Application Method	Transfer Efficiency	Potential PM (tons/ year)
Chopper Area (Filled Resin - Truck Covers)	Resin (COR54-AA-115) - Styrene (HAP)	9.16	31.5%	6.00	4.00	68.00	179.39	32.74	32.74	Flow Coater	100%	0.00
Chopper Area Neat Resin Applicator (CANRA) - Transportation Parts	COR61-AA-267S - Styrene (HAP)	9.26	28.30%	6.00	4.00	61.00	162.68	29.69	29.69	FIT Mechanical Non-Atomized	100%	0.00
	COR61-AA-267S - Alpha Methyl Styrene (Non-HAP)	9.26	2.20%	6.00	4.00	5.00	13.33	2.43	0.00		100%	0.00
							Total PTE VOC/HAP and PM from Neat Resin Use Before Control	**32.12**	**29.69**			**0.00**
							Control Efficiency*	**0.00%**	**0.00%**			**95.00%**
							Total PTE VOC/HAP and PM from Neat Resin Use After Control	**32.12**	**29.69**			**0.00**
							****Worst Case Potential to Emit Before Control**	**32.74**	**32.74**			**0.00**

METHODOLOGY
*Existing Permitted Source Controls and Rated Efficiency
Acetone as cleanup solvent
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 2009) to calculate resin emissions.
Potential VOC (lb/day) for resin = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 24 hrs/day * 1 ton material/2000 lbs material
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)
Potential HAP (ton/year) = Potential VOC (ton/year) as Styrene Only
**Chopper area can either make truck covers or transportation parts, but not both at the same time. Therefore, PTE based on worst case emissions per pollutant assuming only one product is made year round.

Appendix A: Emissions Calculations
VOC Emissions
From Miscellaneous Solvent Use - Chopper Area

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Chopper Area	Cadox D-30 MEKP - Catalyst [(1)(2)(3)]	8.34	83.00%	2.0%	81.0%	2.0%	0.00%	0.35	4.00	6.89	6.76	9.46	226.98	41.42
Solvent Cleanup	Acetone	6.61	100.00%	100.0%	0.0%	100.0%	0.00%	0.50	4.00	#DIV/0!	0.00	0.00	0.00	0.00

Total PTE VOC/HAP & PM from Chopper Area Miscellaneous Use Before Control	**9.46**	**226.98**	**41.42**
Control Efficiency*	**0.00**	**0.00**	**0.00**
Total PTE VOC/HAP and PM from Chopper Area Miscellaneous Use After Control	**9.46**	**226.98**	**41.42**

METHODOLOGY

(1) MEKP catalyst solution Cadox D-30: 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate, 79% max, MEK, 2% max, water, 2% max
(2)MEKP Catalyst used in both Filled and Neat resin processes.
(3)MEKP Catalyst does not contain solids. Cleaning solvent hand applied.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Materials do not contain Hazardous Air Pollutants

Appendix A: Emissions Calculations
Open Molding Gelcoat (GA)
Approved in 2014 for Modification

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Emission Unit ID	Material (resin or gel name)	Weight % Styrene	Weight % MMA	Maximum usage (lb/unit)	Maximum throughput (units/hr)	Maximum throughput (lb/yr)	UEF (lbs styrene/ton resin or gel)	UEF (lbs MMA/ton resin or gel)	PTE of styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of VOC (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)	PM control efficiency	Controlled PTE of PM (tons/yr)	Weight % Cobalt compounds	PTE of Cobalt compounds (tons/yr)
GA Gelcoat area	GA	White gelcoat*	28.8%	-	1.5	25.0	328,500	158.91	-	13.05	-	13.05	95%	5.84	90%	0.58	1%	0.06

Notes:
*Source provided MSDS sheet for this material
Calculations for the gelcoat and lamination areas are based on maximum gelcoat and resin usages, maximum unit throughput, and worst-case gelcoat and resin for this process.
These maximum usages and throughputs represent the throughputs when the gelcoat and resin processes are operating at maximum line speeds and do not represent actual rates.
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
MMA is methyl methacrylate
Assume all non-MMA VOC is styrene and PM = PM_{10} = $PM_{2.5}$.
Application method for all resins and gelcoats is fluid impingement technology (FIT) (mechanical, non-atomized).
[1] UEFs are not provided for MMA in resins. Therefore, MMA UEF for gelcoats is assumed
Although the resin areas (lamination, barrier coat, and tooling booth) are equipped with dry filters, the transfer efficiency is 100% so there are no particulate emissions to control from these processes

Methodology
Maximum throughput (lb/yr) = Maximum usage (lb/unit) * Maximum throughput (units/hr) * 8760 hrs/yr
PTE of styrene or MMA (tons/yr) = Maximum throughput (lb/yr) * 1 ton resin or gel /2000 lbs resin or gel * UEF (lbs styrene or MMA/ton resin or gel) * 1 ton styrene or MMA/2000 lbs styrene or MMA
PTE of VOC (tons/yr) = PTE of styrene (tons/yr) + PTE of MMA (tons/yr)
Uncontrolled PTE of PM (tons/yr) = Maximum throughput (lb/yr) * (1- (Weight % Styrene +Weight % MMA)) * (1 - Transfer efficiency) * 1 ton/2000 lbs
Controlled PTE of PM (tons/yr) = Uncontrolled PTE of PM (tons/yr) * (1 - Control efficiency)
PTE of Cobalt compounds = Weight % Cobalt Compounds * Uncontrolled PTE of PM (tons/yr)

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations
Mold Shop

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Potential HAP as Styrene (tons per year)	Potential HAP as MMA (tons per year)	Potential Total HAP (tons per year)	Application Method	Transfer Efficiency	Potential PM (tons/ year)
Mold Shop Gel Coat Applicator (MSG)	Tooling Gel Coat - Styrene (HAP)	9.54	38.97%	24.00	0.01	418.00	11.48	2.10	2.10	0.00	2.10	HVLP Atomized Applicator	75%	1.45
Mold Shop Gel Coat Applicator (MSG)	Tooling Gel Coat - MMA (HAP)	9.54	3.00%	24.00	0.01	45.00	1.24	0.23	0.00	0.23	0.23			
Mold Shop Resin Applicator (MSR)	Aropol 7241T-15 - Styrene (HAP)	9.17	46.87%	240.00	0.01	115.00	30.37	5.54	5.54	0.00	5.54	FIT Mechanical Non-Atomized	100%	0.00
Total PTE VOC/HAP and PM from Tooling Gel Coat and Resin Use Before Control								**7.87**	**7.64**	**0.23**	**7.87**			**1.45**
Control Efficiency*								**0.00%**	**0.00%**	**0.00%**	**0.00%**			**95.00%**
Total PTE VOC/HAP and PM from Tooling Gel Coat and Resin Use After Control								**7.87**	**7.64**	**0.23**	**7.87**			**0.07**

METHODOLOGY
*Existing Permitted Source Controls and Rated Efficiency
Acetone as cleanup solvent
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 2009) to calculate gel coat and resin emissions.
Potential VOC (lb/day) for gel coat and resin = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb HAP emitted/ton material) * 24 hrs/day * 1 ton material/2000 lbs material
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)
Potential HAP (ton/year) = Potential VOC (ton/year) as Styrene and MMA

Appendix A: Emissions Calculations
VOC Emissions
From Miscellaneous Solvent Use - Mold Shop

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Mold Shop Gel Coat Applicator (MSG)	Cadox D-30 MEKP - Catalyst[(1)(2)]	8.34	83.00%	2.0%	81.0%	2.0%	0.00%	0.004	0.01	6.89	6.76	0.00027	0.0065	0.00118
Mold Shop Resin Applicator (MSR)	Cadox D-30 MEKP - Catalyst[(1)(2)]	8.34	83.00%	2.0%	81.0%	2.0%	0.00%	0.040	0.01	6.89	6.76	0.0027	0.065	0.0118
Solvent Cleanup	Acetone	6.61	100.00%	100.0%	0.0%	100.0%	0.00%	0.50	0.01	#DIV/0!	0.00	0.00	0.00	0.00
											Total PTE VOC/HAP and PM from Mold Shop Miscellaneous Use Before Control	**0.0030**	**0.071**	**0.0130**
											Control Efficiency*	**0.00**	**0.00**	**0.00**
											Total PTE VOC/HAP and PM from Mold Shop Miscellaneous Use After Control	**0.0030**	**0.071**	**0.0130**

METHODOLOGY

(1) MEKP catalyst solution Cadox D-30: 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate, 79% max, MEK, 2% max, water, 2% max
(2)MEKP Catalyst does not contain solids. Cleaning solvent hand applied.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Materials do not contain Hazardous Air Pollutants

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

Company Name: Composite Technology Assemblies, LLC
Address City IN Zip: 904 Markley Road, Plymouth, Indiana 46563
Significant Source Modification Number: 099-34382-00023
Significant Permit Modification Number: 099-34390-00023
Reviewer: Sarah Street
Date: 02/11/13

[4]Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water or Exempt	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Type of Product and Material being coated
A, B, C, and D																	
[1, 2] Autoclear HS + LV clearcoat	9.58	75.0%	65.0%	10.0%	0.0%	42.7%	0.380	1.00	0.96	0.96	0.36	9	1.6	1.00	2.24	75%	Fiberglass
[1]Fast Reducer	7.51	100.0%	0.0%	100.0%	0.0%	0.0%	0.250	1.00	7.51	7.51	1.88	45	8.2	0.00	NA	75%	Fiberglass
3.5 Fast Reducer	7.50	100.0%	0.0%	100.0%	0.0%	0.0%	0.250	1.00	7.50	7.50	1.88	45	8.2	0.00	NA	75%	Fiberglass
[1]Autobase Plus MM Q231 Toner	8.44	63.9%	0.0%	63.9%	0.0%	27.8%	0.250	1.00	5.39	5.39	1.35	32	5.9	0.83	19.4	75%	Fiberglass
[1]Autobase Plus Q090 Toner	7.98	66.7%	0.0%	66.7%	0.0%	27.2%	0.250	1.00	5.32	5.32	1.33	32	5.8	0.73	19.6	75%	Fiberglass
1K Basecoat Toners	8.20	76.0%	0.0%	76.0%	0.0%	21.0%	0.250	1.00	6.23	6.23	1.56	37	6.8	0.54	29.7	75%	Fiberglass
[1, 2] Autoclear HS + LV Hardener	10.56	65.0%	65.0%	0.0%	0.0%	45.3%	0.040	1.00	0.00	0.00	0.000	0.0	0.00	0.162	NA	75%	Fiberglass
[1, 2] Autoclear HS + LV LH Activator Spot and Panel	9.33	100.0%	60.0%	40.0%	0.0%	12.8%	0.040	1.00	3.73	3.73	0.149	3.6	0.65	0.000	29.27	75%	Fiberglass
[1, 2] Autoclear HS + LV LH Activator Medium	9.63	100.0%	60.0%	40.0%	0.0%	0.0%	0.040	1.00	3.85	3.85	0.15	4	0.7	0.00	NA	75%	Fiberglass
GA																	
Catalyst (Luperox)	8.36	98.0%	0.7%	97.3%	0.7%	1.0%	0.020	4.00	8.19	8.13	0.651	15.6	2.85	0.015	813	75%	Fiberglass

Total Potential is based on the worst case coating for each booth

Each booth (A, B, C, and D) can operate at the same time using a different coating for each booth

Potential Before Controls of 1 booth (tons/year)	**17.32**	**1.99**	[3]PM Controls	96%	Controlled PTE of particulate (tons/year)
Potential Before Controls of all booths (A, B, C and D) (tons/year)	**69.27**	**7.97**			0.08

Note 1: The source provided the MSDS sheets for these coatings on June 2, 2010, July 12, 2010 and July 19, 2010. The other coatings and their PTE was calculated in permit No. T099-17543-00023,issued on March 14, 2006.

Note 2: Autoclear HS + LV clearcoat, Autoclear HS + LV LH Activator Medium, Autoclear HS + LV Hardener, and Autoclear HS + LV LH Activator Spot and Panel all contain parachlorobenzotrifluoride (PCBTF) CAS # 98-56-6 which has been determined to have negligible photochemical reactivity by the EPA and is listed as VOC exempt. Therefore, VOC PTE emissions do not include parachlorobenzotrifluoride for any of these coatings.

Note 3: The particulate control of 96% is taken from the control % of the dry filters for emission unit GA pursuant to T099-17543-00023, issued on March 14, 2006.

Note 4: Only one (1) of each type of coatings is used. Different coating types are separated in the table.

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Controlled PM, tons per year = Uncontrolled PM * (1 - % Control of Dry filter)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Case Coating

Appendix A: Emissions Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

[4]Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % 1,2,4-Trimethylbenzene	Weight % Formaldehyde	Weight % Toluene	Weight % Xylene	Weight % MIK	Weight % Ethyl Benzene	1,2,4-Trimethylbenzene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)	MIK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	
A, B, C, D																
[1]Fast Reducer	7.51	0.250	1.00	0.00%	0.00%	0.00%	2.90%	0.00%	0.68%	0.00	0.00	0.00	0.24	0.00	0.06	
3.5 Fast Reducer	7.50	0.250	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	
[1]Autobase Plus MM Q231 Toner	8.44	0.250	1.00	0.00%	0.00%	0.00%	1.49%	0.00%	0.35%	0.00	0.00	0.00	0.14	0.00	0.03	
Autobase Plus Q090 Toner	7.98	0.250	1.00	11.40%	0.00%	2.82%	1.42%	0.00%	0.43%	1.00	0.00	0.25	0.12	0.00	0.04	
1K Basecoat Toners	8.20	0.250	1.00	0.00%	0.100%	0.00%	10.0%	0.00%	5.00%	0.00	0.009	0.00	0.90	0.00	0.45	
[1, 2] Autoclear HS + LV Hardener	10.56	0.040	1.00	0.00%	0.00%	0.0%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.000	
[1, 2, 3] Autoclear HS + LV LH Activator Spot and Panel	9.33	0.040	1.00	0.00%	0.00%	0.0%	0.00%	25.00%	0.10%	0.00	0.00	0.00	0.00	0.41	0.002	
									Potential Before Controls of 1 booth (tons/year)	**1.00**	**0.01**	**0.25**	**1.14**	**0.41**	**0.51**	**3.30**
																Total:
Total Potential is based on the worst case coating for each booth									**Potential Before Controls of all booths (A, B, C and D) (tons/year)**	**3.98**	**0.04**	**0.99**	**4.55**	**1.63**	**2.03**	**13.21**

Each booth (A, B, C, and D) can operate at the same time using a different coating for each booth

Note: Catalyst (Luperox) does not contain any HAPs. Methyl ethyl ketone delisted as of December 19, 2005, from HAP list. Autoclear HS + LV clearcoat and Autoclear HS + LV LH Activator Medium also do not contain any HAPs.

Note 1: The source provided the MSDS sheets for these coatings on June 2, 2010, July 12, 2010 and July 19, 2010. The other coatings and their PTE was calculated in permit No. T099-17543-00023,issued on March 14, 2006.

Note 2: Autoclear HS + LV clearcoat, Autoclear HS + LV LH Activator Medium, Autoclear HS + LV Hardener, and Autoclear HS + LV LH Activator Spot and Panel all contain parachlorobenzotrifluoride (PCBTF) CAS # 98-56-6 which has been determined to have negligible photochemical reactivity by the EPA and is listed as VOC exempt. Therefore, VOC PTE emissions do not include parachlorobenzotrifluoride for any of these coatings.

Note 3: Autoclear HS + LV LH Activator Spot and Panel contains 10-25% mixed ketone solvent, for PTE 25% is used under MIK.

Note 4: Only one (1) of each type of coatings is used. Different coating types are separated in the table.

METHODOLOGY

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

Appendix A: Emissions Calculations
Particulate Emissions
From Insignificant Activities

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Unit Number	Equipment Description	Control Equipment	[1]Efficiency of Control Equipment	[2]PM Controlled (tons/yr)	PM Controlled (lb/hr)	PM Uncontrolled PTE (tons/year)	PM PSD Minor Limit (lb/hr)	PM PSD Minor Limit (ton/yr)
GR	One (1) grinding area	Fabric Filter	99.0%	0.82	0.19	82.12	14.00	61.32
CO	One (1) cut out area	Fabric Filter	99.0%	0.82	0.19	82.12	14.00	61.32
Assume that PM = PM10 = PM2.5			Total	**1.64**		**164.25**		**122.64**

Methodology:
Note 1: Source provided the control efficiency of the fabric filters.
Note 2: Source collected 1.5 lbs of particulate in 1 day and estimated that the most they would ever collect would be 4.5lbs of particulate from each operation the GR and CO.

Therefore the controlled emisisons from each in tons/year = 4.5 lbs/day x 365 day/yr x 1 ton/2,000 lbs

Emission Rate in tons/yr (before control) = Emission Rate (after control (tons/yr)) / (1-control efficiency)

Control Efficiency needed to comply with PSD Minor limit	25%

Appendix A: Emissions Calculations
Open Molding Lamination and Gelcoat (EU-01 to EU-12)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Emission Unit ID	Material (resin or gel name)	Weight % Styrene	Weight % MMA	Maximum usage (lb/unit)	Maximum throughput (units/hr)	Maximum throughput (lb/yr)	UEF (lbs styrene/ton resin or gel)	UEF (lbs MMA/ton resin or gel)	PTE of styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of VOC (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)	PM control efficiency	Controlled PTE of PM (tons/yr)	Weight % Cobalt compounds	PTE of Cobalt compounds (tons/yr)
Gelcoat area	P2-01 through P2-07	White gelcoat	28.8%	-	11.0	30.0	2,890,800	158.91	-	114.84	-	114.84	95%	51.43	90%	5.14	1%	0.51
Lamination area	P2-08 through P2-11	Production resin	34.0%	-	55.0	30.0	14,454,000	74.00	-	267.40	-	267.40	100%	0.00	N/A	N/A	-	-
Barrier coat area	P2-12	Barrier coat resin	37.0%	-	-	-	4,380	83.00		0.09	-	0.09	100%	0.00	N/A	N/A	-	-

Notes:
Calculations for the gelcoat and lamination areas are based on maximum gelcoat and resin usages, maximum unit throughput, and worst-case gelcoat and resin for this process.
These maximum usages and throughputs represent the throughputs when the gelcoat and resin processes are operating at maximum line speeds and do not represent actual rates.
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
MMA is methyl methacrylate
Assume all non-MMA VOC is styrene and PM = PM_{10} = $PM_{2.5}$.
Application method for all resins and gelcoats is fluid impingement technology (FIT) (mechanical, non-atomized).
[1] UEFs are not provided for MMA in resins. Therefore, MMA UEF for gelcoats is assumed
Although the resin areas (lamination, barrier coat, and tooling booth) are equipped with dry filters, the transfer efficiency is 100% so there are no particulate emissions to control from these processes

Methodology
Maximum throughput (lb/yr) = Maximum usage (lb/unit) * Maximum throughput (units/hr) * 8760 hrs/yr
PTE of styrene or MMA (tons/yr) = Maximum throughput (lb/yr) * 1 ton resin or gel /2000 lbs resin or gel * UEF (lbs styrene or MMA/ton resin or gel) * 1 ton styrene or MMA/2000 lbs styrene or MMA
PTE of VOC (tons/yr) = PTE of styrene (tons/yr) + PTE of MMA (tons/yr)
Uncontrolled PTE of PM (tons/yr) = Maximum throughput (lb/yr) * (1- (Weight % Styrene +Weight % MMA)) * (1 - Transfer efficiency) * 1 ton/2000 lbs
Controlled PTE of PM (tons/yr) = Uncontrolled PTE of PM (tons/yr) * (1 - Control efficiency)
PTE of Cobalt compounds = Weight % Cobalt Compounds * Uncontrolled PTE of PM (tons/yr)

Appendix A: Emissions Calculations
Resin Transfer Molding (Closed Molding) (RTM1, RTM2, & RTM3)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Emission Unit ID	Material	Weight % styrene	Max coating usage (lb/unit)	Max production rate (unit/hr)	Max usage (lb/hr)	Styrene emission factor (% emitted)[1]	PTE of styrene (lb/hr)	PTE of styrene (lb/day)	PTE of styrene (ton/yr)
RTM 1	Altek RTM Polyester Resin	42.00%	35.0	8.00	280	3%	3.53	84.67	15.45
RTM 2	Altek RTM Polyester Resin	42.00%	35.0	8.00	280	3%	3.53	84.67	15.45
RTM 3	Altek RTM Polyester Resin	42.00%	35.0	8.00	280	3%	3.53	84.67	15.45

Notes:
These calculations are derived from the Title V Source Modification application received by IDEM on July 1 , 2013
[1] Styrene emission factor (% emitted) is the % of styrene (by weight) emitted from closed molding, from AP-42 Section 4.4, Table 4.4-2
Styrene is the only VOC/HAP in the resin. Therefore, PTE of styrene = PTE of total HAPs = PTE of VOC
Particulate emissions are only emitted from spray-type operations. Therefore transfer efficiency and PTE of PM are not applicable for closed resin molding.

Methodology:
Max usage (lb/hr) = Max coating usage (lb/unit) * Max production rate (unit/hr)
PTE of styrene (lb/hr) = Weight % styrene * Max usage (lb/hr) * Styrene emission factor (% emitted)
PTE of styrene (lb/day) = PTE of styrene (lb/hr) * 24 hrs/day
PTE of styrene (ton/yr) = PTE of styrene (lb/hr) * 8700 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Resin transfer molding - Gelcoat applicators (RTMG 1 through RTMG 5)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Emission Unit ID	Material	Density (lb/gal)	Weight % Styrene	Max coating usage (gal/unit)	Max production rate (unit/hr)	Max usage (ton/hr)	NESHAP emission limit (lb/ton)[1]	PTE of styrene (lb/hr)	PTE of styrene (lb/day)	PTE of styrene (ton/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)	PM control efficiency	Controlled PTE of PM (tons/yr)
RTM 1 - Gel Coat applicators	RTMG 1	Gelcoat	7.84	28.84%	0.65	8	0.020	377	7.68	184.43	33.66	95%	6.35	95%	0.318
RTM 2 - Gel Coat applicators	RTMG 2, RTMG 3	Gelcoat	7.84	28.84%	0.65	8	0.020	377	7.68	184.43	33.66	95%	6.35	95%	0.318
RTM 3 - Gel Coat applicators	RTMG 4, RTMG 5	Gelcoat	7.84	28.84%	0.65	8	0.020	377	7.68	184.43	33.66	95%	6.35	95%	0.318

Notes:
These calculations are derived from the Title V Source Modification application received by IDEM on July 1 , 2013
[1] Rather than use the Unified Emission Factors (UEF) for these units, the source has selected to use the NESHAP emission limit as the styrene emission factor, as worst-case emissions.
NESHAP emission limit is from 40 CFR 63, Subpart WWWW Table 3, for open molding - other pigmented gelcoat.
Styrene is the only VOC/HAP in the gelcoat. Therefore, PTE of styrene = PTE of total HAPs = PTE of VOC
Application method for gelcoats is fluid impingement technology (FIT) (mechanical, non-atomized).
Assume $PM=PM_{10}=PM_{2.5}$

Methodology:
Max usage (ton/hr) = Density (lb/gal) * Max coating usage (lb/unit) * Max production rate (unit/hr) * 1 ton/2000 lbs
PTE of styrene (lb/hr) = Max usage (ton/hr) * NESHAP emission limit (lb/ton)
PTE of styrene (lb/day) = PTE of styrene (lb/hr) * 24 hrs/day
PTE of styrene (ton/yr) = PTE of styrene (lb/hr) * 8700 hrs/yr * 1 ton/2000 lbs
Uncontrolled PTE of PM (tons/yr) = Maximum throughput (lb/hr) * (1- Weight % Styrene) * (1 - Transfer efficiency) * 8760 hr/yr * 1 ton/2000 lbs
Controlled PTE of PM (tons/yr) = Uncontrolled PTE of PM (tons/yr) * (1 - Control efficiency)

Appendix A: Emissions Calculations
VOC and Particulate
Mix Tanks (MT1 & MT2)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Process	Emission Unit ID	Weight % VOC/HAP	Filler/powder loading	Maximum throughput (tons/yr)	VOC/HAP emission factor	PTE of VOC/HAP (ton/yr)	PM emission facor	Uncontrolled PTE of PM (tons/yr)	PM control efficiency	Controlled PTE of PM (tons/yr)
Mix Tank 1	MT1	32.00%	38.0%	5314	0.25%	4.25	0.10%	2.02	99.9%	0.002
Mix Tank 2	MT2	32.00%	38.0%	5314	0.25%	4.25	0.10%	2.02	99.9%	0.002

Notes:
Assume all VOC/HAP is styrene and $PM=PM_{10}=PM_{2.5}$
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 No. T039-33297-00556 for Crane Composites, Inc.

Methodology:
PTE of VOC (ton/yr) = Weight % VOC/HAP * Maximum throughput (tons/yr) * VOC/HAP emission factor
Uncontrolled PTE of PM (ton/yr) = Filler powder loading * Maximum throughput (tons/yr) * PM emission factor
Controlled PTE of PM (tons/yr) = Uncontrolled PTE of PM (tons/yr) * (1 - Control efficiency)

Appendix A: Emissions Calculations
VOC/HAPs
Three (3) Polyester Resin Storage Tanks (RT1 through RT3), and Two (2) Day Tanks (DT1 & DT2)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

TANKS Summary	**PTE (tons/yr)**
Styrene - RT1	0.075
Styrene - RT2	0.075
Styrene - RT3	0.075
Total for All Tanks	**0.22**

Results from Tanks 4.0.9d

Notes:
Emissions from the Day Tanks (DT1 & DT2) are assumed to be negligable.

Appendix A: Emissions Calculations
Trimming Booths (TB1 & TB2)

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Outlet grain loading (grains/acf)	Air flow rate (acf/m)	Control efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (lb/day)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (lb/day)	Controlled PTE of PM (ton/yr)
0.0029	325	99%	0.54	12.93	2.36	0.008	0.194	0.035
0.0029	325	99%	0.54	12.93	2.36	0.008	0.194	0.035

Note:
Assume $PM=PM_{10}=PM_{2.5}$

Methodology:
Uncontrolled PTE of PM (lb/hr) = Outlet grain loading (grains/acf) * Air flow rate (acf/min) / (1-Control efficiency) * 60 min/hr * 1 lb/7000 grains
Controlled PTE of PM (lb/hr) = Outlet grain loading (grains/acf) * Air flow rate (acf/min) * 60 min/hr * 1 lb/7000 grains
PTE of PM (lb/day) = PTE of PM (lb/hr) * 24 hrs/day
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only

MM BTU/HR <100

Company Name: **Composite Technology Assemblies, LLC**
Address City IN Zip: **904 Markley Road, Plymouth, Indiana 46563**
Significant Source Modification Number: **099-34382-00023**
Significant Permit Modification Number: **099-34390-00023**
Reviewer: **Sarah Street**

Emission unit	Emission Unit ID	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Heat Input Capacity(MMBtu/hr)
Air make-up unit	AM1	1	5.04	5.04
Air make-up unit	AM2	1	2.31	2.31
Radiant heater	H1	1	0.24	0.24
Radiant heater	H2	1	0.125	0.125
Radiant heaters	H3 - H19	17	0.01	0.17
Forced-air heaters (BH 1 to 5)	H20 - H25	5	0.06	0.30
		Totals:	**8.185**	**8.2**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
8.2	1020	70.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.51	0.19	2.95

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.381E-05	4.218E-05	2.636E-03	6.327E-02	1.195E-04	**6.614E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.757E-05	3.866E-05	4.921E-05	1.336E-05	7.381E-05	**1.926E-04**
					Total HAPs	**6.633E-02**
					Worst HAP	**6.327E-02**

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	4,218	0.1	0.1
Summed Potential Emissions in tons/yr	4,218		
CO2e Total in tons/yr	4,243		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Mark Naylor
Composite Technology Assemblies, LLC
PO Box 82
Plymouth, IN 46563-0082

DATE: July 22, 2014

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

SUBJECT: Final Decision
Title V - Significant Permit Modification
099 - 34390 - 00023

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:
Doug Elliott D & B Environmental Services
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 22, 2014

TO: Plymouth Public Library

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

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

Applicant Name: Composite Technology Assemblies, LLC
Permit Number: 099 - 34390 - 00023

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	LPOGOST 7/22/2014 Composite Technology Assemblies 099 - 34390 - 00023 /final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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2		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 *(Local Official)*									
3		Plymouth Public Library 201 North Center Street Plymouth IN 46563-2103 *(Library)*									
4		Pymouth City Council and Mayors Office 124 N Michigan St Plymouth IN 46563 *(Local Official)*									
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
6		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 *(Health Department)*									
7		LaPaz Town Council PO Box 0820 LaPaz IN 46537 *(Local Official)*									
8		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 *(Affected Party)*									
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