



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: May 20, 2014

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

Source Name: R3 Composites Corporation

Permit Level: Interim Significant Source Modification Petition Approval

Permit Number: 003-34435i-00383

Source Location: 14123 Roth Road, Grabill, 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 34435i.

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

*(continues on next page)*

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

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

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

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

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



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May 20, 2014

Candy Salisbury  
R3 Composites Corporation  
14123 Roth Road  
Grabill, IN 46741

Re: Interim Significant Source Modification Petition Approval  
003-34435i-00383

Dear Ms. Salisbury:

On April 16, 2014, the Office of Air Quality (OAQ) received an interim Significant Source Modification petition from R3 Composites, located at 14123 Roth Road, in Grabill, Indiana for construction of one (1) new sheet molding compound manufacturing line, consisting of four (4) 7,000 gallon resin holding tanks, one (1) calcium carbonate silo, two (2) 600 gallon mixing tanks, two (2) 800 gallon holding tanks, one (1) compound mix machine, and one (1) maturation area.

A public notice of the interim Significant Source Modification petition was published in The Journal Gazette on April 29, 2014. The public comment period ended on May 13, 2014.

There were no comments received during the public comment period. This interim Significant Source Modification petition is in effect upon issuance and will expire on the effective date of the final Significant Source Modification permit (003-34435-00383).

The interim Significant Source Modification petition may be revoked after the effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final Significant Source Modification permit is denied. The IDEM has reviewed this interim Significant Source Modification petition and has not found any such reason. The facilities subject to this approval may not operate until the final Significant Permit Modification is issued by OAQ.

The interim Significant Source Modification petition is federally enforceable. Detailed construction and operation conditions will be specified in the final Significant Source Modification permit 003-34435-00383.

If you have any questions regarding this interim Significant Source Modification petition, please contact Ryan Graunke, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Ryan Graunke or extension 4-5374, or dial (317) 234-5374.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Enclosure: Interim Permit Evaluation (4 pages)

REG

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

Jason Morrison  
10339 Dawsons Creek Blvd, Suite E  
Fort Wayne, IN 46825

## Indiana Department of Environmental Management Office of Air Management

### Interim Significant Permit Revision / Significant Source Modification Evaluation Sheet

<b>Company Name:</b> R3 Composites Corporation	
<b>Location:</b> 14123 Roth Road, Grabill, IN 46741	<b>Permit No:</b> 003-34435I-00383
<b>Permit Reviewer:</b> Ryan Graunke	<b>Date Receipt of Application:</b> April 16,2014
	<b>Date of review:</b> 5/16/2014
<b>Description of the interim construction:</b> Install one (1) new sheet molding compound manufacturing line, consisting of four (4) 7,000 gallon resin holding tanks, one (1) calcium carbonate silo, two (2) 600 gallon mixing tanks, two (2) 800 gallon holding tanks, one (1) compound mix machine, and one (1) maturation area.	
<b>Public Notice Period</b> = 4/29/2014 to 5/13/2014	
<b>Public Notice Date + 3 days = 17 days =</b> 5/16/14	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
  - (1) construction of a PSD source or PSD modification;
  - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
  - (3) any modification subject to 326 IAC 2-4.1.
- (c) Public notice comment period is 14 calendar days.

**Instructions: Check (✓) appropriate answers and make a recommendation.**

1. Did the applicant submit a written petition for an interim significant permit revision or significant source modification?

- Yes Go to question 2.  
 No Ignore verbal request.

2. Did the applicant pay the applicable interim permit fee? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.

- Yes Go to question 3.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

Comments: \_\_\_\_\_

3. Did the applicant state acceptance of federal enforceability of an interim significant permit revision or significant source modification?

- Yes Go to question 4.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?

- Yes Go to question 5.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).

5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim significant permit revision or significant source modification is issued), including, but not limited to:

- (a) Financial risk,
- (b) Risk that additional emission controls may be required,
- (c) Risk that the final significant permit revision or significant source modification may be denied.

- Yes Go to question 6.
- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).

6. Did the applicant begin construction prior to submitting the interim significant permit revision or significant source modification application?

- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
- No Go to question 7.

7. What is the type of the interim construction?

- New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
- Modification to an existing source Go to question 8.

8. Did the applicant present data in the interim significant permit revision or significant source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?

- Yes Go to question 9.
- No Deny the application pursuant to:  
326 IAC 2-13-1(c)(2)(B), for PSD;  
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;  
326 IAC 2-13-1(c)(2)(C), for state rules.

9. Is the proposed modification to be located in a nonattainment area?

- Yes Go to question 10.
- No Go to question 11.

County: Allen County

Comments: \_\_\_\_\_

10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?

- Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
- No Go to question 11.

11. Did the petition include a complete description of the process?

- Yes Go to question 12.
- No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).

12. Did the interim significant permit revision or significant source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.

- Yes Go to question 13.
- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?  
 Yes Go to question 14.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?  
 Yes Go to question 15.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?  
 Yes Go to question 16.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?  
 Yes Go to question 17.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).  
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim significant permit revision or significant source modification petition?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).  
 No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).  
 No Approve the interim significant permit revision or significant source modification petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.  
 Yes Go to question 21.  
 No Deny the application, pursuant to 326 IAC 2-13-1(e).
- Newspaper: The Journal Gazette
- Date of publication: 4/29/2014
21. Were comments received within seventeen (17) days after the public notice of the interim significant permit revision or significant source modification?  
(14 calendar days for comment period + 3 working days for mailing)  
 Yes Evaluate the comments received, and make a recommendation.  
 No Issue the final interim significant permit revision or significant source modification approval.

Comments: \_\_\_\_\_  
\_\_\_\_\_

Recommendation: Approval of Issuance

Date the applicant was informed of the decision: 5/19/2014

Method of informing the applicant: Electronic mail

**Particulate Emissions  
Emissions Calculations  
Particulate Emissions From SMC Manufacturing Operations**

Unit ID	Total Anticipate PM Collected (lbs/hour)	Process Weight Rate (lbs/hour)	Dry Material (lbs/hour)	Control Efficiency of Vibra Shake 1500 Celulose Filter with HEPA post-filter (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
SMC-EU-01	12.428	7,500	3,000	99.99%	12.43	54.44	0.001	0.005

**Methodology**

Assume worst case: all PM = PM-10.

Potential Emissions (lbs/hr) = PM Collected (lbs/hr) / Control Efficiency (%)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) \* (1 - Control Efficiency (%))

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Studies have demonstrated HEPA post-filter is capable of filtering efficiency for 0.3 micron PM at 99.97% resulting in expectation of greater than 99.99% efficiency for PM-10.

Particulate Emissions for SMC-EU-01 calculations based on emissions testing performed at Magna plant in Grabbill, Indiana and extrapolated.

Unit ID	Process Weight Rate (lbs/hour)	Dry Material (lbs/hour)	Control Efficiency Polyester BHA-TEX fabric bag filter (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
SMC-SILO-01	7,500	3,465	99.99%	27.68	121.24	0.0028	0.012

**Methodology**

Assume worst case: all PM = PM-10.

Emission Factors taken from AP-42 11.19.02

Throughput = 1.73 tons/hr

Controlled Emissions Factor = 0.0016 lbs/ton Total PM

Uncontrolled Emissions Factor = Controlled Emissions Factor + ((100% - PM-10 Efficiency%) + 100%) = 16 lbs/ton

Potential Emissions (lbs/hr) = Throughput x Emissions Factor = 27.68 lbs/hr

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs) = 121.24 tons/yr

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) \* (1 - Control Efficiency (%)) = 0.0028 lbs/hr

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs) = 0.012 tons/hr

$$\text{Uncontrolled emission factor} = \frac{\text{Controlled total particulate emission factor}}{(100\% - \text{PM-10 Efficiency \%})/100\%}$$

Equation 1

**Criteria Emissions****VOC and Styrene Emissions from SMC Manufacturing Operations**

Unit ID	Description	SMC Throughput (tons/hour)	VOC Emission Factor (lbs/ton SMC)	Styrene Emission Factor (lbs/ton SMC)	Potential VOC Emissions (lbs/hour)	Potential Styrene Emissions (lbs/hour)	Potential VOC Emissions (tons/year)	Potential Styrene Emissions (tons/year)
SMC-EU-01	SMC Machine	3.75	2.52	2.52	9.4434	9.4434	41.36	41.36
SMC-ST-01	Resin Storage Tanks	3.75	0.059	0.059	0.221	0.221	0.97	0.97
SMC-MIX-01	Mixing Station	3.75	0.19	0.19	0.713	0.713	3.12	3.12
SMC-HOLD-01	Maturation Area	3.75	0.0018	0.0018	0.007	0.007	0.03	0.03
					<b>Total</b>	<b>10.38</b>	<b>45.48</b>	<b>45.48</b>

**METHODOLOGY**

Potential Emissions (lbs/hour) = SMC Throughput (tons/hour) x Emission factor (lbs/ton)

Potential Emissions (tons/year) = Potential Emissions (lbs/hour) \* 8760 hrs/yr / 2000 lbs/ton

All VOC is Styrene

Emission Factors for Resin Storage Tanks, Mixing Station, and Maturation Area are extrapolated based on emissions calculations included in air permit for Magna plant in Grabill, Indiana which are based on "Q and A: Composites Manufacturing Emissions - A Guide for Composites Manufacturers, Communities and Regulators" June 1999 Emission factors for the Mixing Station are based on emission factors approved by the Ohio EPA for the same process. These factors were based on a stack test.

SMC Machine (SMC-EU-01) emissions calculated via SMC Emissions Rate Calculator using ANSI/ACMA/ICPA UEF-1-2011a

Actual SMC emissions using SMC Emission Rate Calculator is included with this permit modification application

## Aquatic SMC Machine Emissions ( Styrene VOC)

SMC Emissions Rate Calculator		
ANSI/ACMA/ICPA UDF-1-2013a		
"E = 0.1457 * At - 0.1454"		
9.4434	E	VOC emission rate, lb/hr, when paste is on line
65.8122	At	Total wet area of machine = Adl+Adu+W(Ll+Lu)
5.6666	Adl	open area of lower doctor box, ft <sup>2</sup>
5.6666	Adu	open area of upper doctor box, ft <sup>2</sup>
5.0000	W	Wet width of SMC, ft
7.3333	Ll	Lower wet length, ft
3.5625	Lu	Upper wet length, ft

### SMC Emissions (PTE, 24/7)

Rate 9.4434

Date	Machine Hours	Emission Rate lb/hr	Monthly Emission (lbs.)	12 Mo. Rolling Emissions (Tons) TPY
Jan-14	744.0	9.4434	7025.9175	
Feb-14	672.0	9.4434	6345.9900	
Mar-14	744.0	9.4434	7025.9175	
Apr-14	720.0	9.4434	6799.2750	
May-14	744.0	9.4434	7025.9175	
Jun-14	720.0	9.4434	6799.2750	
Jul-14	744.0	9.4434	7025.9175	
Aug-14	744.0	9.4434	7025.9175	
Sep-14	720.0	9.4434	6799.2750	
Oct-14	744.0	9.4434	7025.9175	
Nov-14	720.0	9.4434	6799.2750	
Dec-14	744.0	9.4434	7025.9175	41.3623

Actual will be less due to current demand

All tanks, hoppers will be closed unless adding material

PM emissions unknown

**XAffidavit of Construction**

I, MARK GLIDDEN, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

- I live in ALLEN County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- I hold the position of PRESIDENT for R3 COMPOSITES  
(Title) (Company Name)
- By virtue of my position with R3 COMPOSITES, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of R3 COMPOSITES  
(Company Name)
- I, the undersigned, have submitted an interim (minor permit revision, significant permit revision, minor source modification, significant source modification) petition to the Office of Air Quality for the construction of SMC LINE.
- \_\_\_\_\_

recognizes the following risks:  
(Company Name)

- (a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and
- (d) any additional air permitting requirements.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature: [Handwritten Signature]

Printed Name: MARK GLIDDEN

Phone No.: 313 510 0474

Date: 4/11/14

STATE OF INDIANA)

COUNTY OF Allen)

Subscribed and sworn to me, a notary public in and for Allen

County and State of Indiana on this 11<sup>th</sup> day of April

, 20 14  
My Commission expires: 8-1-21

Signature: Cynthia Hembree

\*\*\*\*\*  
\* "OFFICIAL SEAL" \*  
\* CYNTHIA J. HEMBREE \*  
\* Notary Public, State of Indiana \*  
\* Resident of Allen Co., Indiana \*  
\* My Commission Expires: August 1, 2021 \*  
\*\*\*\*\*

Printed Name: Cynthia Hembree

revised 3/23/01 drp

**Introduction**

R3 Composites Corporation (R3) owns a facility located at 14123 Roth Road, Grabill, Indiana (003-00383). R3 currently operates under Title V permit No. 003-33830-00383. The facility uses compression molding to manufacture various plastic products.

Pursuant to 326 IAC, this application is seeking a significant source modification to install a sheet molding compound (SMC) operation that will be owned and operated by Aquatic and housed in the R3 facility. Applicable Indiana Department of Environmental Management (IDEM) forms are included as Attachment A to this document.

**Description of Proposed Modification**

R3 is a plastics molding operation with surface coating capabilities on-site. SMC is currently shipped to the facility for molding by R3. Aquatic is proposing to purchase, install and operate an SMC operation at the R3 facility where 100% of the SMC manufactured will be molded on-site by R3. This will increase potential emission of the site for VOCs HAPs and PM/PM10.

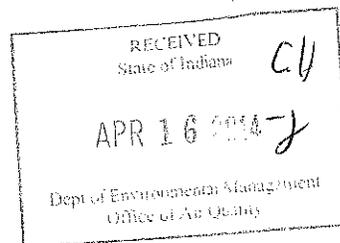
Additionally, Aquatic wishes to install an emergency/backup 150KWh generator.

**Changes in Emissions**

Attachment A of this document includes emission calculations for all pieces of the SMC operation. All calculations are based on VOC content from SDS that are included. Emission factors were obtained from ANSI/ACMA/ICPA UEF-1-2011a

**Attachments:****IDEM Forms**

- GSD forms & associated support documents
- CE forms & Dust Collector Information
- PI forms including Backup Generator Documents
- Colocation Form
- Safety Data Sheets



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE  
MODIFICATION, MINOR PERMIT REVISION, OR MINOR PERMIT MODIFICATION

SOURCE NAME: R3 Composites  
SOURCE ADDRESS: 14123 Roth Road, Grabill, Indiana 46741  
MAILING ADDRESS: 14123 Roth Road, Grabill, Indiana 46741  
SIC/NAICS Code: 3089; 326199

**Description of Operation or Equipment:**

Sheet molding compound (SMC) Paste reservoir dispenses a measured amount of specified resin paste onto a plastic carrier film. This carrier film passes underneath a chopper which cuts the fibers onto the surface. Once these have drifted through the depth of resin paste, another sheet is added on top which sandwiches the glass. The sheets are compacted and then enter onto a take-up roll, which is used to store the product while it matures.

The SMC line consists of:

- 4 - 7,000 gallon holding tanks for raw materials (styrene based resins)
- 1- Silo containing Calcium Carbonate (Diameter = 12 ft; Height = 36 ft; outside)
- 2 - 600 gallon mixers
- 2 - 800 gallon holding tanks
- Compound Mix Machine (fiberglass strands are added at this point; machine yields finished SMC in vinyl)
- Maturation Area (curing of product)

The four 7,000 gallon tanks and four mixing/holding tanks listed above will be contained in a separate room from the rest of the facility (~4,000 sq. ft. room). The walls of this room are constructed of insulated gypsum board walls (two sheets of 5/8 inch gypsum board with fiberglass insulation between). The gypsum board walls will be coated with a fire-rated sealant on each side. This will yield one-hour fire-rated walls.

Containment for the 7,000 gallon tanks will be provided. It will be constructed of concrete block to X inches high, calculated to hold 7,000 gallons of spilled resin, sprinkler system flow (at 0.3 gpm/sq. ft.), 500 gpm hose, and 2" freeboard.

All tanks will be constructed of steel. This entire tank room will be provided with Class 1, Division 1 electrical equipment. Ventilation will also be provided at the ceiling level, rated at 3,000 cfm. All tanks and associated piping will be grounded.

The 7,000 gallon tanks will each contain 100% polyester resin (32% weight styrene). The flashpoint of this material is 87.6°F, and its boiling point is 293°F.

The 600 gallon mixing tanks will contain 40% polyester resin and 60% calcium carbonate (filler - fed from the silo). The mixture will then be sent to the 800 gallon holding tanks, where it will also contain the same concentrations of materials.

In addition to the above materials, a Low Profile Additive will be used in the process (65% weight styrene; Flash Point = 87.6°F; Boiling Point = 293°F), and a B Side Resin will be used as well (35-40% weight magnesium oxide fume; Flash Point = 240°F; Boiling Point > 400°F).

A catalyst will also be used in the process, which will be stored outside in the Catalyst Shed (location & containment TBD), which is about 100 sq. ft. in area with a roof over the area. This material will be stored in 1 gallon plastic jugs.

### **Potential to Emit:**

Maximum Potential to Emit (PTE) for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) as Styrene is 45.48 tons per year. The breakdown of emissions is as follows:

- SMC Production Line            41.36 tpy
- Storage Tanks                    0.97 tpy
- Dynamic Mixers                 3.12 tpy
- Maturation                        0.03 tpy

Maximum PTE of Particulate Matter (PM) from this operation is 175.68 tons per year before controls from the SMC line and Silo. PM10 and PM2.5 emissions are equivalent. The breakdown is as follows:

- SMC Production Line            54.44 tpy
- Calcium Carbonate Silo         121.24 tpy

### **PSD Requirements:**

In order to remain a PSD minor source, R3 would like to accept a limit of 26 tons per year of each PM, PM10 and PM2.5 emissions from the SMC Operation which would keep the whole facility under 250 tons per year of each. That 26 ton limit will be broken down to 18 tons of each (PM, PM10 and PM2.5) from the calcium carbonate silo and 8 tons of each from the SMC line.

In order to remain a PSD minor source R3 would like to accept a limit of 40 tons per year of VOC emissions on the SMC production line which would keep the whole facility under 250 tons per year of VOC. Emissions will be tracked on a daily spreadsheet to ensure the limits are not exceeded.

### **NSPS Requirements:**

40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 does not apply according to 40 CFR 60.110b:

*“(a) Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.”*

The reason NSPS does not apply is that the storage tanks that will hold the VOL are only 26.498 cubic meters (m3).

**NESHAP Requirements:**

Under 40 CFR 63 (NESHAP), Subpart WWWW, this is considered a sheet molding compound (SMC) manufacturing operation.

- 40 CFR 63.5780
- 40 CFR 63.5785
- 40 CFR 63.5790
- 40 CFR 63.5795
- 40 CFR 63.5797
- 40 CFR 63.5800
- 40 CFR 63.5805 (b), (c), (d)(1), (e), (f), and (g)
- 40 CFR 63.5835 (a) and (c)
- 40 CFR 63.5840
- 40 CFR 63.5860 (a)
- 40 CFR 63.5900 (a)(2), (a)(4), (b), and (c)
- 40 CFR 63.5905
- 40 CFR 63.5910 (a), (b), (c) (1) through (5), (d), (g), (h), and (i)
- 40 CFR 63.5915 (a), and (d)
- 40 CFR 63.5920
- 40 CFR 63.5925
- 40 CFR 63.5930
- 40 CFR 63.5935
- Table 2 to Subpart WWWW of Part 63 - Applicable Portions
- Table 4 to Subpart WWWW of Part 63 - Applicable Portions
- Table 9 to Subpart WWWW of Part 63 - Applicable Portions
- Table 13 to Subpart WWWW of Part 63 - Applicable Portions
- Table 14 to Subpart WWWW of Part 63 - Applicable Portions
- Table 15 to Subpart WWWW of Part 63 - Applicable Portions

**State Rules & Requirements:**

- 326 IAC 2-7-4(c)
- 326 IAC 2-7-5(14)
- 326 IAC 2-7-1(22)
- 326 IAC 2-7-4(c)(3)
- 326 IAC 2-7-5(14)
- 326 IAC 2-7-1(21)
- 326 IAC 2-7-4(c)
- 326 IAC 2-7-5(14)
- 326 IAC 2-7-2
- 326 IAC 2-7-1
- 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)
- 326 IAC 2-1.1-9.5
- 326 IAC 2-7-7, IC 13-17-12

326 IAC 2-7-5(5)  
326 IAC 2-7-5(6)(D)  
326 IAC 2-7-5(6)(E)  
326 IAC 2-7-4(f)  
326 IAC 2-7-6(1)  
326 IAC 2-7-5(3)(C)  
326 IAC 2-7-6(5)  
326 IAC 2-7-5(12)  
326 IAC 1-6-3  
326 IAC 2-7-16  
326 IAC 2-7-15  
326 IAC 2-7-20  
326 IAC 2-7-12  
326 IAC 2-1.1-9.5  
326 IAC 2-7-10.5  
326 IAC 2-7-10  
326 IAC 2-7-4(a)  
326 IAC 2-7-5(6)(C)  
326 IAC 2-7-8(a)  
326 IAC 2-7-9  
326 IAC 2-7-3  
326 IAC 2-7-4  
326 IAC 2-7-8(e)  
326 IAC 2-7-11  
326 IAC 2-7-12  
326 IAC 2-7-5(8)  
326 IAC 2-7-12(b)(2)  
326 IAC 2-7-20  
326 IAC 2-7-10.5  
326 IAC 2-7-10.5  
326 IAC 2-7-6IC 13-14-2-2, IC 13-30-3-1, IC 13-17-3-2  
326 IAC 2-7-11  
326 IAC 2-7-19  
326 IAC 2-7-5(7)  
326 IAC 2-1.1-7  
326 IAC 2-7-5(3)  
326 IAC 2-7-662 FR 8314  
326 IAC 1-1-6  
326 IAC 2-7-5(1)  
326 IAC 6-3-2  
326 IAC 5-1  
326 IAC 4-1, IC 13-17-9  
326 IAC 4-2  
326 IAC 9-1-2  
326 IAC 6-4  
326 IAC 14-10  
326 IAC 18, 40 CFR 61, Subpart M

326 IAC 2-7-6(1)  
326 IAC 3-6  
326 IAC 2-1.1-11  
326 IAC 2-1.1-11  
326 IAC 2-7-5(1)  
326 IAC 2-7-6(1)  
326 IAC 2-7-5(3)  
326 IAC 2-7-6(1), 40 CFR 64  
326 IAC 3-8  
326 IAC 2-1.1-11  
326 IAC 2-7-5(3)  
326 IAC 2-7-6(1)  
326 IAC 2-7-5  
326 IAC 2-7-6  
326 IAC 1-5-2  
326 IAC 1-5-3  
326 IAC 2-7-5(12), 40 CFR 68  
326 IAC 3-8  
326 IAC 2-7-5, 40 CFR 64  
326 IAC 2-7-6  
326 IAC 2-7-5  
326 IAC 2-7-6  
326 IAC 2-7-5(3)  
326 IAC 2-7-19  
326 IAC 2-7-5(3)(C)(iii)  
326 IAC 2-7-5(7)  
326 IAC 2-7-19(c)  
326 IAC 2-6  
326 IAC 2-7-5(3)  
326 IAC 2-7-6  
326 IAC 2-7-5(3)(C)  
326 IAC 2-1.1-11, 40 CFR 64  
326 IAC 3-8  
40 CFR 82 and 326 IAC 22-1  
326 IAC 2-7-5(1)  
326 IAC 8-2-12  
326 IAC 2-7-5(12)  
326 IAC 2-7-6(6)  
326 IAC 2-7-5(1)  
326 IAC 2-7-6(1)  
40 CFR 64 Compliance Assurance Monitoring (CAM)  
326 IAC 2-7-6(1)  
326 IAC 2-7-5(1) 40 CFR 64  
326 IAC 2-7-5(3)  
326 IAC 2-7-19  
326 IAC 2-7-5(1)  
326 IAC 6-2-4

326 IAC 2-7-5(1)  
326 IAC 20-1  
326 IAC 20-56, 40 CFR Part 63, Subpart WWWW

**Federal Enforceability:**

The company consents to the federal enforceability of this interim petition.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title or Position: \_\_\_\_\_

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

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

Signature:

*[Handwritten Signature]*

Printed Name:

+ MARK ELIOTT

Title or Position:

+ PRESIDENT

Phone Number:

+ 313 510 6474

Date:

+ 4/11/14

## Indiana Department of Environmental Management Office of Air Quality

<b>Interim Petition Checklist</b>	
Instructions: (a) Please answer yes or no. (b) Enclosed this checklist with the completed interim petition package.	
Company Name: R3 Composites	
Location: Grabill, Indiana	
YES	1. Is the written interim petition prepared?
YES	2. Is the written petition signed and dated?
YES	3. Is the public notice drafted?
YES	4. Is the filing and review fee enclosed? \$625 for TV, FESOP, and SSOA. \$500 for MSOP.
YES	5. Is the account number written on the check or money order?
YES	6. Is the Affidavit of Construction signed, dated, and notarized?
YES	7. Is the proposed modification/revision described in detail?
YES	8. Is the proposed modification/revision a modification or addition to an existing source?
YES	9. Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
NO	10. Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
NA	11. Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
YES	12. Are potential emissions calculated?
YES	13. Is federal enforceability consent specifically indicated?
NA	14. Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
NA	15. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
YES	16. Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
YES	17. Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
YES	18. Has a regular modification/revision permit application been submitted to OAQ?
NO	19. Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
X	20. The interim petition comment period has been decided to be: <b>14 calendar days</b>
Additional Comments:	

RECEIVED  
 State of Indiana  
 APR 16 1994  
 Dept. of Environmental Management  
 Office of Air Quality

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision/Significant Source Modification

**For R3 Composites Corporation**

**In Allen County**

Notice is hereby given that the above company located at 14123 Roth Road, Grabill, Indiana 46741, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a Sheet Molding Compound (SMC) operation with a dust collector unit as air pollution control. Based on 8,760 hours per year of operation, the VOC/HAP Potential to Emit (PTE) is 47.363 tons and PM/PM10 emissions with emission controls will be 2.72 tons.

The company has submitted an application for a significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Allen County Public Library, 17530 State Road 37, Grabill, IN 46741**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, MC-61-53, Room 1003, Indianapolis, Indiana 46204-2251.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must be a written request to the OAQ, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:



Company Official's Printed Name:

MARIC GLIADEN

Company Name:

R3 COMPOSITES

# The Journal Gazette

Account # 1067211 - 1121176

Allen County, Indiana

Concentra EHS

## PUBLISHER'S CLAIM

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Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set) -- number of equivalent lines	_____
Head -- number of lines	_____
Body -- number of lines	_____
Tail -- number of lines	_____
Total number of lines in notice	<u>80</u>

### COMPUTATION OF CHARGES

<u>80</u> lines, <u>1</u> column(s) wide equals	
<u>80</u> equivalent lines at \$ <u>2.610</u> cents per line	\$ 208.80

Additional charges for notices containing rule or tabular work  
(50 per cent of above amount)

Charge for extra proofs of publication  
(\$1.00 for each proof in excess of two)

TOTAL AMOUNT OF CLAIM	<u>\$ 208.80</u>
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### DATA FOR COMPUTING COST

Width of single column in picas . . . . 9.8    Size of type . . . . 7point.  
Number of Insertions . . . . 1

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size, which was duly published in said paper 1 times.

The dates of publication being as follows:

4/29/2014

Additionally, Newspaper has a Web site and this public notice was posted on the same day as it was published in The Journal Gazette.

*T. Brown-Smith*

T. Brown-Smith  
Legal Clerk

Date: April 29, 2014

ATTACH COPY OF ADVERTISEMENT HERE

**NOTICE OF 14-DAY PERIOD  
FOR PUBLIC COMMENT**

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For R3 Composites Corporation  
In Allen County

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Questions should be directed to OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251, or call (800) 451-6027 or (317) 233-0178.

Company Official's Signature:

Mark Glidden

Company Name: R3 Composites  
4--29 1121176 hspaxlp



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Candy Salisbury  
R3 Composites Corporation  
14123 Roth Road  
Grabill, IN 46741

DATE: May 20, 2014

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

SUBJECT: Final Decision  
Interim Significant Source Modification Petition Approval  
003-34435i-00383

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:  
Jason Morrison – SevenGen HSE  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 5/20/2014 R3 Composites Corporation 003-34435i-00383 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Candy Salisbury R3 Composites Corporation 14123 Roth Road Grabill IN 46741-0189 (Source CAATS) via confirmed delivery										
2		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
3		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
4		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
5		New Haven City Council and Mayors Office P.O. Box 570 New Haven IN 46774 (Local Official)										
6		Grabill Town Council P.O. Box 321, 13717 First Street Grabill IN 46741 (Local Official)										
7		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
8		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
9		Mr. Jason Morrison SevenGen HSE 10339 Dawsons Creek Blvd suite 7E Fort Wayne IN 46825 (Consultant)										
10												
11												
12												
13												
14												
15												

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8			