INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	June 12, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	AK Industries
Permit Level:	Title V - Minor Source Modification
Permit Number:	099 - 34562 - 00043
Source Location:	2055 Pidco Drive, Plymouth, Indiana
Type of Action Taken:	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 34562.

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 approval 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) 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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June 12, 2014

Ms. Rosalind Marshall
AK Industries, Inc.
2055 Pidco Drive
Plymouth, IN 46563

Re: 099-34562-00043
Minor Source Modification

Dear Ms. Marshall,

AK Industries, Inc. was issued Part 70 Operating Permit Renewal No. T099-31041-00043 on July 3, 2012 for a stationary fiber reinforced plastic composite tank & tubing manufacturing operation, located at 2055 Pidco Drive, Plymouth, Indiana 46563. An application to modify the source was received on May 23, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Minor Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(f)(3), this Minor Source Modification authorizes the construction of the new emission unit(s) when the Minor Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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, refer to the IDEM's 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 Aida DeGuzman of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Aida DeGuzman or extension 3-4972 or dial (317) 233-4972.

Sincerely,

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments: Minor Source Modification and Technical Support Document

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

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MINOR SOURCE MODIFICATION TO A PART 70 SOURCE OFFICE OF AIR QUALITY

AK Industries, Inc.
2055 Pidco Drive
Plymouth, Indiana 46563

(herein known as the Permittee) is hereby authorized to construct subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this Permit.

This approval is issued in accordance with 326 IAC 2, and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Minor Source Modification No.: T099-34562-00043	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 12, 2014

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Compliance Monitoring Requirements

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

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fiber reinforced plastic composite tank & tubing manufacturing operation.

Source Address:	2055 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	574-936-6022
SIC Code:	3999 & 3089
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Lamination area in Building 1 consisting of: One (1) hand layup operation, identified as HL1, with no direct exhaust and three (3) nonatomized resin applicators, identified as CP1, CP2, and CP3, respectively. Each nonatomized resin applicator has a maximum resin use design rate of 240 pounds per hour, with emissions controlled by a dry filter system, exhausted to stacks F1, F2, F3, F7, and F8 respectively. Under 40 CFR 63, Subpart WWWW, the one (1) hand layup area and the three (3) nonatomized resin applicators are considered an existing open molding reinforced plastic composites production operation. These facilities were constructed in 1999;

(b) One (1) portable gel coat applicator, identified as G1, in Building 1 with a maximum resin use design rate of 63.1 pounds per hour, with emissions controlled by a dry filter system, which exhausts to stack F1, F2, or F3. Under 40 CFR 63, Subpart WWWW, the one (1) portable gel coat applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1990;

(c) One (1) filament winding bath, identified as FWB1, located in Building 1 with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized (flowcoater) chop-hoop open molding winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units. These facilities were constructed in 1999;

(e) One (1) nonatomized (flowcoater) chop-hoop open molding winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This

facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the open molding winding applicator is considered an existing affected open molding winding unit. Note: The four (4) chop-hoop open molding winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

(f) One (1) portable nonatomized resin spray applicator, identified as CPC4, with a maximum resin use design rate of 213 pounds per hour, located in Building 4 with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin spray applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(g) One (1) mold repair and prep booth for sanding and waxing metal molds, identified as FCG1, with a maximum resin use design rate of 43.1 pounds per hour, located in Building 1, with no external exhaust, and constructed in 1999. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(h) One (1) portable nonatomized resin applicator, identified as FCR1, located in Building 1 with a maximum resin use design rate of 25 pounds per hour, with emissions exhausted to stack F4. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(i) One (1) pulverizer, identified as RP3, constructed in 2000, with maximum rate of production of 949 lbs/hour of Polyethylene pieces, using a cyclone as control, which exhausts to stack RP3;

(j) Two (2) fiberglass resin storage tanks, identified as T1 and T2, with capacities of 5,000 gallons each. Under 40 CFR 63, Subpart WWWW, the two (2) resin storage tanks are considered existing HAP-containing materials storage units. These storage tanks were constructed in 1999;

(k) One (1) paint booth identified as PB1, with a maximum design rate of 6 metal lids/hr, located in Building 4 with particulate emissions controlled by a dry filter system which exhausts to stacks F5 and F6. This facility was constructed in 1999;

(l) One (1) hand grinding booth, identified as CB1, with a maximum design capacity of 2.08 tons of fiberglass/hr, with emissions controlled by a dry filter, which exhausts inside the building. This facility was constructed in 1999;

(m) One (1) sand blasting booth, identified as CB2, with a maximum design capacity of 0.5 tons of blasting material/hr, with particulate emissions controlled by a dry filter system, which exhausts inside the building. This facility was constructed in 1999;

(n) One (1) resin transfer molding process, identified as RTM1, with a maximum resin use design rate of 214 pounds of resin per hour with no direct external exhaust. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing affected closed molding operation;

(o) One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4, using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation;

(p) One hand grinding booth, identified as CB3, with a maximum grinding rate of 50 lbs per hour, exhausting to a 48" fan utilizing fabric filters, and approved in 2012 for construction, located in building 4; and

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) The following activities with emissions equal to or less than the insignificant thresholds in 326 IAC 2-7-1(21)(A), (B), and (C) [326 IAC 6-3-2]:

(1) One (1) hand tooling and finishing area (HT1),

(2) Two (2) pulverizer units (PR1 and PR2),

(3) One (1) regrind unit (RP2),

(4) Two (2) metal inert gas welding units (W1 and W2),

(5) Two (2) plasma cutting units (PC-1 and PC-2),

(6) One (1) metal cutting unit (MC-1),

(7) One (1) metal sanding unit (MS-1),

(8) One (1) metal drilling unit (D-1),

(9) One (1) fiberglass tube cutter (TC-1),

(10) One (1) fitting area (F-1), and

(11) One pipe fitting and touch up operation, identified as FT2, with a maximum operating rate of 2.35 units per hour, approved in 2012 for construction, using no controls.

(b) Degreasing operations that do exceed 145 gallons per 12 months and not subject to 40 CFR 63 Subpart T [326 IAC 8-3-2] [326 IAC 8-3-5]. The degreasing unit is used only for maintenance activities.

(c) Paved and unpaved 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, T099-31041-00043, 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(34), 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(34).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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(34).

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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(34).

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(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**.**

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T099-31041-00043 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) 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(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.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(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) 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)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.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.

(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(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.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(34).

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(34).

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. 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. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) 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) Lamination area in Building 1 consisting of: One (1) hand layup operation, identified as HL1, with no direct exhaust and three (3) nonatomized resin flow coat applicators, identified as CP1, CP2, and CP3, respectively. Each nonatomized resin flow coat applicator has a maximum resin use design rate of 240 pounds per hour, with particulate emissions controlled by a dry filter system, exhausted to stacks F1, F2, F3, F7, and F8 respectively. Under 40 CFR 63, Subpart WWWW, the one (1) hand layup area and the three (3) nonatomized resin flow coat applicators are considered an existing open molding reinforced plastic composites production operation. These facilities were constructed in 1999;

(b) One (1) portable gel coat applicator, identified as G1, in Building 1 with a maximum resin use design rate of 63.1 pounds per hour, with particulate emissions controlled by a dry filter system, which exhausts to stack F1, F2, or F3. Under 40 CFR 63, Subpart WWWW, the one (1) portable gel coat applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1990;

(c) One (1) filament winding bath, identified as FWB1, located in Building 1 with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized (flowcoater) chop-hoop open molding winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units. These facilities were constructed in 1999;

(f) One (1) portable nonatomized resin applicator, identified as CPC4, with a maximum resin use design rate of 213 pounds per hour, located in Building 4 with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(g) One (1) mold repair and prep booth for sanding and waxing metal molds, identified as FCG1, with a maximum resin use design rate of 43.1 pounds per hour, located in Building 1, with no external exhaust, and constructed in 1999. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(h) One (1) portable nonatomized resin applicator, identified as FCR1, located in Building 1 with a maximum resin use design rate of 25 pounds per hour, with emissions exhausted to stack F4. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999; and

(j) Two (2) fiberglass resin storage tanks, identified as T1 and T2, with capacities of 5,000 gallons each. Under 40 CFR 63, Subpart WWWW, the two (2) resin storage tanks are considered existing HAP-containing materials storage units. These storage tanks were constructed in 1999.

(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]

The VOC emissions from the use of paints, coatings, resins, gel coats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, FWSH5, and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to T099-7547-00043, issued on April 20, 2001 the fiberglass parts manufacturing shall comply with the following Best Available Control Technology (BACT):

(a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic compound from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, October 13, 2009 or its updates (with the exception of the emission factors for controlled spray application), and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: American Composites Manufacturers Association (ACMA) Emission Models for the Reinforced Plastics Industries, Unified Emission Factors dated July 23, 2001, or its updates.

(b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats,

closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin and >37% gel coat) - (Emissions from 35% resin and 37% gel coat) ≤ (Emissions from 35% resin and 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and/or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used in the following manner:

(1) To apply 50% of all neat resins within 6 months of commencement of operation.

(2) To apply 100% of all neat resins used within 1 year of commencement of operation.

(d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The Permittee shall comply with the following work practices:

(1) To the extent possible, a non-VOC solvent shall be used for cleanup.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC-containing materials shall be kept covered when not in use.

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

Pursuant to 326 IAC 6-3-2(d) dry filters shall be in operation at all times during the operation of the gel coat booth (G-1). Pursuant to 326 IAC 6-3-2(d)(1), the source shall operate the dry filters in accordance with manufacturer's specifications.

D.1.4 Reinforced Plastics Composites Production [326 IAC 20-56-2]

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

(a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(1) All personnel hired shall be trained within (30) days of hiring.

(2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employees.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:

(1) A copy of the current training program.

(2) A list of the following:

(A) All current personnel, by name, that are required to be trained.

(B) The date the person was trained or date of the most recent refresher training, whichever is later.

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

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOCs)

Compliance with the VOC usage limitations contained in Condition D.1.1 and D.1.2 shall be determined as follows:

(a) 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, gel coat, catalyst, solvent and mold release agent used in the reinforced plastics composites manufacturing operations.

(b) The VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors approved by IDEM, OAQ in "Unified Emission Factors for Open Molding of Composites", October 13, 2009, or its updates, as follows:

(1) Styrene/VOC emissions from resins and gel coats:
ES = (F1 * R * 1 ton/2,000 lbs), where:
ES = Styrene/VOC emissions (tons)
F1 = Emission factor (lbs emitted per ton of resin used)
R = Total amount of resin used (tons) **

(2) Methyl Methacrylate (MMA)/catalyst emissions from resins and gel coats:
EM = (F2 * R * 1 ton/2,000 lbs), where:
EM = Methyl Methacrylate (MMA)/catalyst emissions (tons)
F2 = Emission factor (lbs emitted per ton resin/gel coat processed) **
R = Total amount of resin/gel coat used (tons)

** Emission factor shall be specific to material, application method and % monomer content.

(3) VOC from solvents, mold release agents and other VOC:
EV = (F3 * V * K * 1 ton/2,000 lbs), where:
EV = VOC emissions (tons)
F3 = Emission factor of 1.0 (in absence of other data, assume all VOC is emitted)
V = Percent of VOC content (from applicable MSDS sheet)
K = Total amount of solvents, mold release agents and other VOC (lbs)

(4) Total VOC emissions in tons = ES + EM + EV

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAP monomer content limitations in Condition D.1.2 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.

(b) The manufacturer's material safety data sheet.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of

resins or gel coats to require that the procedure be performed on un-catalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) The HAP emissions for gel coats, resins, and catalysts shall be calculated by multiplying the usage of each gel coat, resin, and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in "Unified Emission Factors for Open Molding of Composites (styrene and methyl methacrylate content in gel coat)", October 13, 2009, or its updates.

(e) An alternate method approved by IDEM, OAQ.

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) portable gel coat applicator, identified as G1, while in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks F1, F2, and F3, 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. 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat.

(2) The monomer content of each resin and gel coat used.

(3) The amount of resin and gel coat used on monthly basis.

(4) Method of application and other emission reduction techniques for each resin and gel coat used;

(5) The total calculated HAP emissions for each month.

(6) The total HAP emissions for each compliance period.

(7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(c) To document the compliance status with Condition D.1.4, the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(d) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of inspections of the dry filters.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter period being reported, using the reporting forms located at the end of this permit, or their equivalent. 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 (34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(k) One (1) paint booth identified as PB1, with a maximum design rate of 6 metal lids/hr, located in Building 4 with particulate emissions controlled by a dry filter system which exhausts to stacks F5 and F6. This facility was constructed in 1999.

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

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

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

The VOC emissions from the use of paints, coatings, resins, gel coats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, FWSH5, and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the paint booth PB1, shall be controlled by dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator of the one (1) paint booth, identified as PB1 shall not allow the discharge into the atmosphere VOC in excess of:

(1) three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings at temperatures up to 90°C, or for extreme performance coatings. Note that the paint supplier certifies that each batch of coatings applied to metal contains no greater than 3.5 pounds of VOCs per gallon of coating less water.

(2) four and three-tenths (4.3) pounds of VOC per gallon, excluding water, for clear coatings. Note that the paint supplier certifies that each batch of clear coatings applied to metal contains no greater than 4.3 pounds of VOCs per gallon of coating less water.

(3) three (3.0) pounds per gallon, excluding water, for all other coatings and coating application systems. Note that the paint supplier certifies that each batch of miscellaneous coatings (e.g. primers, etc...) applied to metal contains no greater than 3.0 pounds of VOCs per gallon of coating less water.

(4) If more than one (1) emission limitation in this subsection applies to a specific coating, then the least stringent emission limitation shall be applied (three (3) pounds per gallon).

D.2.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products Requirements - Subpart MMMM [40 CFR 63.3881(b)]

In order to render the requirements of 40 CFR Part 63, Subpart MMMM not applicable to the paint booth, identified as PB1, the input of coatings applied to miscellaneous metal parts or products shall be less than 946 liters (250 gallons) of coatings that contain hazardous air pollutants (HAP) per twelve (12) consecutive month period with compliance determined at the end of each month, excluding coatings that meet the definition of a non-HAP containing coating in 40 CFR 63.3981.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC usage limitation contained in Conditions D.2.1, and D.2.3 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) If claiming a credit for VOCs shipped off-site for disposal or recycling, the Permittee shall determine the VOC content of the combined coating material and cleanup shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C - Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).

(c) Compliance with the VOC usage limitation contained in condition D.1.1 shall be demonstrated not later than thirty (30) days of the end of each month. This shall be based on the total VOC used for the previous month, minus the VOC shipped off-site, and adding it to the previous 11 months total VOC usage, minus the VOC shipped off-site, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. Analysis shall include weight of coating material and solvent in each container shipped off-site and VOC content test results, as necessary to verify the type and amount recycled.

(1) The VOC emissions for each month shall be calculated using the following equation:

VOC emitted = $VOC_U - VOC_R$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

Compliance Monitoring Requirements

D.2.8 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 paint booth identified as PB1 while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take 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.

(b) 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. 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.

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.1 and D.2.3, the Permittee shall maintain records of the VOC content of the materials delivered to the operators at the paint booth, identified as PB1, in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.2.1 and D.2.3. Records necessary to demonstrate compliance shall be available not later than thirty (30) days of the end of each compliance period.

(1) The amount and VOC content of each coating material, adhesive, caulking compound, dilution solvent and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) If claiming a credit for VOCs shipped off-site for disposal or recycling, the amount and VOC content of each coating material and solvent shipped off-site each month. Records shall include weight of coating material and solvent in each container shipped off-site and VOC content test results, as necessary to verify the type and amount recycled.

(3) The total VOC usage for each month.

(4) If claiming a credit for VOCs shipped off-site for disposal or recycling, the weight of VOC usage, minus the VOC shipped off-site, for each compliance period.

(5) The weight of VOCs emitted for each compliance period.

(b) To document the compliance status with Condition D.2.5, 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 HAP usage limits established in Condition D.2.5. Records necessary to demonstrate compliance shall be available not later than thirty (30) days of the end of each compliance period.

(1) The HAP content of each coating material and solvent used.

(2) The amount of coatings that contain HAP used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total amount of HAP-containing coatings applied to miscellaneous metal parts or products for each twelve (12) consecutive month period.

(c) To document the compliance status with Condition D.2.8, the Permittee shall maintain a log of inspections of the dry filters.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.1 and D.2.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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(34).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(i) One (1) pulverizer, identified as RP3, constructed in 2000, with maximum rate of production of 949 lbs/hour of Polyethylene pieces, using a cyclone as control and a high efficiency return air system directed to a bag filter, or which exhausts to the atmosphere through stack RP3. This facility was constructed in 1999;

(l) One (1) hand grinding booth, identified as CB1, with a maximum design capacity of 2.08 tons of fiberglass/hr, with particulate emissions controlled by a dry filter, which exhausts inside the building. This facility was constructed in 1999;

(m) One (1) sand blasting booth, identified as CB2, with a maximum design capacity of 0.5 tons of blasting material/hr, with particulate emissions controlled by a dry filter system, which exhausts inside the building. This facility was constructed in 1999; and

(p) One hand grinding booth, identified as CB3, with a maximum grinding rate of 50 lbs per hour, exhausting to a 48" fan utilizing fabric filters, and approved in 2012 for construction, located in building 4.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the Permittee shall comply with the following:

(a) The particulate emissions from the hand grinding (CB1) shall not exceed 6.70 pounds per hour each when operating at a process weight rate of 4,160 pounds per hour;

(b) The particulate emissions from the sand blasting (CB2) facilities shall not exceed 2.58 pounds per hour each when operating at a process weight rate of 1,000 pounds per hour;

(c) The particulate emissions from the pulverizer (RP3) shall not exceed 2.49 pounds per hour when operating at a process weight rate of 0.475 tons per hour; and

(d) The particulate emissions from the hand grinding booth (CB3) shall not exceed 0.551 pounds per hour when operating at a process weight rate less than 100 pounds per hour. When operating at a process weight rate greater than 100 pounds per hour the pound per hour limitations shall be calculated using the following equation:

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 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

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the pulverizer and cyclone control, identified as RP3. 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.3.3 Particulate Control

In order to comply with Condition D.3.1, the cartridge, cyclone, and dry filters used for particulate control shall be in operation and control emissions from the grinding, pulverizing, and blasting facilities (CB1, CB2, CB3, and RP3) at all times that these facilities are in operation.

D.3.4 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.5 Visible Emissions Notations

(a) If venting to the atmosphere, visible emission notations of the stack exhausts of RP3 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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

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

D.3.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the fiberglass pulverizer stack exhaust (RP3). 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, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.3.4, the Permittee shall maintain records of the results of the inspections required under Condition D.3.4.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(b) Degreasing operations that do exceed 145 gallons per 12 months and not subject to 40 CFR 63 Subpart T [326 IAC 8-3-2] [326 IAC 8-3-5]. The degreasing unit is used only for maintenance activities.

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

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

D.4.1 Cold cleaner degreaser control equipment and operating requirements

(a) Pursuant to 326 IAC 8-3-2(a) (Cold cleaner degreaser control equipment and operating requirements), the Permittee shall ensure that the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
(3) If used, solvent spray:

(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

(a) Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) On and after January 1, 2015, the following record keeping requirements shall apply:

(1) The Permittee shall maintain each of the following records for each solvent purchased for use in the cold cleaner degreaser operation:

(A) The name and address of the solvent supplier.
(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
(C) The type of solvent purchased.
(D) The total volume of the solvent purchased.
(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.4.3 Record Keeping Requirements

To document the compliance status with Condition D.4.2(b), all records shall be maintained in accordance with Section C. Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(a) The following activities with emissions equal to or less than the insignificant thresholds in 326 IAC 2-7-1(21)(A), (B), and (C) [326 IAC 6-3-2]:

(1) One (1) hand tooling and finishing area,

(2) Two (2) pulverizer units,

(3) One (1) regrind unit,

(4) Two (2) metal inert gas welding units,

(5) Two (2) plasma cutting units,

(6) One (1) metal cutting unit,

(7) One (1) metal sanding unit,

(8) One (1) metal drilling unit,

(9) One (1) fiberglass tube cutter,

(10) One (1) fitting area; and

(11) One pipe fitting and touch up operation, identified as FT2, with a maximum operating rate of 2.35 units per hour, approved in 2012 for construction, using no controls.

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

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

D.5.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the hand tooling and finishing area, two pulverizer units, regrind unit, metal inert gas welding units, plasma cutting units, metal cutting unit, metal sanding unit, metal drilling unit, fitting area, the fiberglass tube cutter, and the pipe fitting and touch-up area (FT2) shall not exceed the particulate emission rate based on the following equation:

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

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

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) nonatomized (flowcoater) chop-hoop open molding winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the open molding winding applicator is considered an existing affected open molding winding unit. Note: The four (4) chop-hoop open molding winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

(n) One (1) resin transfer molding process, identified as RTM1, with a maximum resin use design rate of 214 pounds of resin per hour with no direct external exhaust. This facility was constructed in 2008. Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing affected closed molding operation;

(o) One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4, using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation; and

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

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

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

D.6.1 PSD Minor Limit [326 IAC 2-2]

The VOC emissions from the use of paints, coatings, resins, gel coats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, FWSH5, and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

D.6.2 Reinforced Plastics Composites Production [326 IAC 20-56-2]

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

(a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(1) All personnel hired shall be trained within (30) days of hiring.

(2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:

(1) A copy of the current training program.

(2) A list of the following:

(A) All current personnel, by name, that are required to be trained.

(B) The date the person was trained or date of the most recent refresher training, whichever is later.

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

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.6.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.6.1.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat.

(2) The monomer content of each resin and gel coat used.

(3) The amount of resin and gel coat used on monthly basis.

(4) Method of application and other emission reduction techniques for each resin and gel coat used;

D.6.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.6.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter period 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 (34).

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

(a) Lamination area in Building 1 consisting of: One (1) hand layup operation, identified as HL1, with no direct exhaust and three (3) nonatomized resin flow coat applicators, identified as CP1, CP2, and CP3, respectively. Each nonatomized resin flow coat applicator has a maximum resin use design rate of 240 pounds per hour, with particulate emissions controlled by a dry filter system, exhausted to stacks F1, F2, F3, F7, and F8 respectively. Under 40 CFR 63, Subpart WWWW, the one (1) hand layup area and the three (3) nonatomized resin flow coat applicators are considered an existing open molding reinforced plastic composites production operation. These facilities were constructed in 1999;

(b) One (1) portable gel coat applicator, identified as G1, in Building 1 with a maximum resin use design rate of 63.1 pounds per hour, with particulate emissions controlled by a dry filter system, which exhausts to stack F1, F2, or F3. Under 40 CFR 63, Subpart WWWW, the one (1) portable gel coat applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1990;

(c) One (1) filament winding bath, identified as FWB1, located in Building 1 with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized (flowcoater) chop-hoop open molding winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units. These facilities were constructed in 1999;

(e) One (1) nonatomized (flowcoater) chop-hoop open molding winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the open molding winding applicator is considered an existing affected open molding winding unit. Note: The four (4) chop-hoop open molding winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

(f) One (1) portable nonatomized resin spray applicator, identified as CPC4, with a maximum resin use design rate of 213 pounds per hour, located in Building 4 with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin spray applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(g) One (1) mold repair and prep booth for sanding and waxing metal molds, identified as FCG1, with a maximum resin use design rate of 43.1 pounds per hour, located in Building 1, with no external exhaust, and constructed in 1999. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(h) One (1) portable nonatomized resin applicator, identified as FCR1, located in Building 1 with a maximum resin use design rate of 25 pounds per hour, with emissions

exhausted to stack F4. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(j) Two (2) fiberglass resin storage tanks, identified as T1 and T2, with capacities of 5,000 gallons each. Under 40 CFR 63, Subpart WWWW, the two (2) resin storage tanks are considered existing HAP-containing materials storage units. These storage tanks were constructed in 1999;

(n) One (1) resin transfer molding process, identified as RTM1, with a maximum resin use design rate of 214 pounds of resin per hour with no direct external exhaust. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing affected closed molding operation; and

(o) One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4, using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation; and

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

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

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

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

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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: Requirements [40 CFR Part 63, Subpart WWWW]

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

(1)	§ 63.5780	
(2)	§ 63.5785	(a)
(3)	§ 63.5790	(a)(b)(c)(d)
(4)	§ 63.5795	(a)(b)
(5)	§ 63.5796	
(6)	§ 63.5797	(a)(b)(c)
(7)	§ 63.5798	(a)(b)
(8)	§ 63.5799	(b)(c)
(9)	§ 63.5800	

(10) § 63.5805 (a)(b)(e)(f)(g)
(11) § 63.5810 (a)(b)(c)(d)
(12) § 63.5820 (a)(b)(c)(d)
(13) § 63.5830 (b)(c)(d)(e)
(14) § 63.5835 (a)(c)
(15) § 63.5860 (a)
(16) § 63.5865 (a)(b)
(17) § 63.5870 (a)(b)(c)(d)(e)
(18) § 63.5875 (a)(b)
(19) § 63.5880 (a)(b)(c)(d)
(20) § 63.5885 (a)(b)(d)
(21) § 63.5890 (a)(b)(c)
(22) § 63.5895 (b)(c)(d)(e)
(23) § 63.5900 (a)(b)(c)(e)
(24) § 63.5905 (a)(b)
(25) § 63.5910 (a)(b)(c)(d)(e)(f)(g)(h)(i)
(26) § 63.5915 (a)(c)(d)(e)
(27) § 63.5920 (a)(b)(c)(d)
(28) § 63.5925
(29) § 63.5930 (a)(b)(c)
(30) § 63.5935
(31) Tables 1, 2, 3, 4, 5, 7, 8, 9, 13, 14, and 15 (the applicable portions of each table)
(32) Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

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

Source Name: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043

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: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043

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: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043
Facility: The fiberglass parts manufacturing operations, including units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH4, FWSH5, CPC4, FCG1, FCR1, RTM1, and CPC5 in conjunction with the paint booth, PB1
Parameter: VOC emissions from all gel coats, resins, paints, coatings, catalysts, solvents and adhesives from the fiberglass manufacturing and surface coating operations
Limit: Less than two hundred forty-seven (247) tons of VOC emitted per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043
Facility: Paint booth, identified as PB1
Parameter: Coatings applied to miscellaneous metal parts or products
Limit: Less than 946 liters (250 gallons) of coatings that contain hazardous air pollutants (HAP) per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043
Facility: The fiberglass parts manufacturing operations, including units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1.
Parameter: VOC/HAP potential emissions from all gel coats and resins
Limit: Less than one hundred (100) tons per year, per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Source Name: AK Industries, Inc.
Source Address: 2055 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T099-31041-00043

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	AK Industries, Inc.
Source Location:	2055 Pidco Drive, Plymouth, IN 46563
County:	Marshall
SIC Code:	3999 & 3089
Part 70 Operating Permit Renewal No.:	T099-31041-00043
Operation Permit Issuance Date:	July 3, 2012
Minor Source Modification No.:	099-34562-00043
Significant Permit Modification No.:	099-34587-00043
Permit Reviewer:	Aida DeGuzman

Existing Approvals

The source was issued Part 70 Operating Permit No. T099-31041-00043 on July 3, 2012. There have been no subsequent approvals issued.

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 June15, 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 the 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 - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	63.15
PM_{10}	63.15
$PM_{2.5}$	63.15
SO_2	0.05
VOC	247*
CO	6.97
NO_X	8.29
GHG as CO2e	10,013.33
HAPs	Limited by NESHAP, Subpart WWWW
Single HAP	> 10
Combined HAPs	> 25

*Based upon Condition D.1.1.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO_2 equivalent (CO_2e) emissions per year. GHG emissions do not affect the source PSD status.

(c) These emissions are based upon the most recent issued permit, TV Renewal No. 099-31041-00043, issued on July 3, 2012.

(d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP (styrene) emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by AK Industries on May 23, 2014 relating to the construction of the following emission unit to enhance operational flexibility and improve product quality:

(a) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	0.18
PM_{10}	0.18
$PM_{2.5}$	0.18
SO_2	--
VOC	9.60
CO	--
NO_X	--
Single HAPs	9.60 (Styrene)
Total HAPs	<25>

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

This modification is subject to 326 IAC 2-7-10.5(f) minor source modification because it has a potential to emit less than ten (10) tons of single HAP (styrene). Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification involves a Title I change. This is a Title I change because the source wide VOC emission limit will be adjusted to accommodate the emissions from the new unit.

Permit Level Determination – PSD

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

	Potential to Emit of Modification (ton/year)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**VOC**	**CO**	**NO_X**	**GHGs**
****New Chop-hoop open molding winding system, FWSH5 (TOTAL PTE of Modification)**	0.18	0.18	0.18	--	9.60	--	--	--
PSD Major Source Thresholds	250	250	250	250	250	250	250	---
	Potential to Emit After Issuance of Modification (tons/year)							
Sourcewide Existing Emission Units Limited PTE	63.15	63.62	63.62	0.05	247	6.97	8.29	10,013.33
****New Chop-hoop open molding winding system, FWSH5 (TOTAL PTE of Modification**	0.18	0.18	0.18	--	9.60	--	--	--
TOTAL PTE AFTER ISSUANCE OF MODIFICATION	63.33	63.33	63.33	0.05	**247	6.97	8.29	10,013.33
PSD Major Source Thresholds	250	250	250	250	250	250	250	---
Subject to Regulation	---	---	---	---	---	---	---	100,000 CO_2e

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
**The source modification will be operated under the existing permitted VOC limits. No increase in the allowable VOC emissions are requested in association with the source modification.

(a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds. Note: the source modification's PTE will be combined into the existing limit of 247 tons per year; no increase in the VOC limit is requested. Therefore, the source will stay an existing minor source under 326 IAC 2-2 (PSD rules).

The existing emission units at the source are currently limited to 247 tons per twelve consecutive month period. The PTE of the new unit will be combined into the 247 ton per year limit: The PSD limit is the following:

(b) The VOC emissions from the use of paints, coatings, resins, gelcoats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, **FWSH5**, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

(a) 40 CFR Part 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production.

This rule applies to new and existing affected source at reinforced plastic composites production facilities. The source has already been determined to be subject to this rule. Therefore, the proposed new unit is likewise subject to this rule since it is part of the facility engaged in this operation.

Nonapplicable portions of the NESHAP will not be included in the permit. The proposed emission unit along with the existing affected source associated with the production of plastic composites is subject to the following portions of 40 CFR 63, Subpart WWWW:

(1)	§ 63.5780	
(2)	§ 63.5785	(a)
(3)	§ 63.5790	(a) (b)(c)(d)
(4)	§ 63.5795	(a)(b)
(5)	§ 63.5796	
(6)	§ 63.5797	(a)(b)(c)
(7)	§ 63.5798	(a)(b)
(8)	§ 63.5799	(b)(c)
(9)	§ 63.5800	
(10)	§ 63.5805	(a)(b)(e)(f)(g)
(11)	§ 63.5810	(a)(b)(c)(d)
(12)	§ 63.5820	(a)(b)(c)(d)
(13)	§ 63.5830	(b)(c)(d)(e)
(14)	§ 63.5835	(a)(c)
(15)	§ 63.5860	(a)
(16)	§ 63.5865	(a)(b)
(17)	§ 63.5870	(a)(b)(c)(d)(e)
(18)	§ 63.5875	(a)(b)
(19)	§ 63.5880	(a)(b)(c)(d)
(20)	§ 63.5885	(a)(b)(d)
(21)	§ 63.5890	(a)(b)(c)
(22)	§ 63.5895	(b)(c)(d)(e)
(23)	§ 63.5900	(a)(b)(c)(e)
(24)	§ 63.5905	(a)(b)
(25)	§ 63.5910	(a)(b)(c)(d)(e)(f)(g)(h)(i)
(26)	§ 63.5915	(a)(c)(d)(e)
(27)	§ 63.5920	(a)(b)(c)(d)
(28)	§ 63.5925	

(29) § 63.5930 (a)(b)(c)
(30) § 63.5935
(31) Tables 1, 2, 3, 4, 5, 7, 8, 9, 13, 14, and 15 (the applicable portions of each table)
(32) Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

(b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

CAM:

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (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.

The proposed new emission unit is not subject to CAM because it does not have a potential to emit equal to or greater than the Part 70 major source thresholds.

State Rule Applicability Determination

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the one (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped, identified as FWSH5 will emit greater than ten (10) tons per year for a single HAP. However, the source, including this proposed unit, is subject to NESHAP 40 CFR Part 63, Subpart WWWW. Therefore, pursuant to 326 IAC 2-4.1-1(b)(2), this source is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, is exempt from 326 IAC 6-3, because its potential particulate emissions of 0.04 pound per hour is less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to new facilities (as of January 1, 1980) that:
(a) have potential emissions of twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or more per year;
(b) are located anywhere in the state; and
(c) are not otherwise regulated by:
(1) other provisions of this article;
(2) 326 IAC 20-48; or
(3) 326 IAC 20-56;
shall reduce VOC emissions using best available control technology (BACT).

The one (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, is not subject to 326 IAC 8-1-6 because it does not have potential VOC emissions equal to or greater than 25 tons per year.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance determination and monitoring requirements applicable to this proposed one (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T099-31041-00043. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Section A.2, Section D.1, Section D.6 and Section E.1 have been revised to incorporate the proposed new emission unit.

Section D.1, Section D.2, Section D.3, and Section D.4 have been revised to reflect the numbering system in Section A.2 and Section A.3:

The chop-hoop listed throughout the permit described as "filament winding units" are actually "chop-hoop open molding winding units." Therefore, the correct unit description (chop-hoop open molding winding unit) has been made throughout the permit. Further, the original source PTE calculations for these chop-hoop units accounted for the worst case emission factor. Therefore, no re-calculation of the PTE has been made for these units.

SECTION A.2 CHANGES:

A.2 Emission Units and Pollution Control Equipment Summary 26 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

* * *

(c) One (1) filament winding bath, identified as FWB1, located in Building ~~4~~ **1** with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the ~~filament~~ **open molding** winding applicators are considered affected ~~filament~~ **open molding** winding units. These facilities were constructed in 1999;

(e) One (1) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the **open molding** ~~filament~~ winding applicator is considered an existing affected ~~filament~~ **open molding** winding unit. Note: The four (4) chop-hoop **open molding** winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

* * *

(o) One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4, using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation; ~~and~~

(p) One hand grinding booth, identified as CB3, with a maximum grinding rate of 50 lbs per hour, exhausting to a 48" fan utilizing fabric filters, and approved in 2012 for construction, **located in building 4; and**

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

SECTION D.1 CHANGES:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Lamination area in Building 1 consisting of: One (1) hand layup operation, identified as HL1, with no direct exhaust and three (3) nonatomized resin flow coat applicators, identified as CP1, CP2, and CP3, respectively. Each nonatomized resin flow coat applicator has a maximum resin use design rate of 240 pounds per hour, with particulate emissions controlled by a dry filter system, exhausted to stacks F1, F2, F3, F7, and F8 respectively. Under 40 CFR 63, Subpart WWWW, the one (1) hand layup area and the three (3) nonatomized resin flow coat applicators are considered an existing open molding reinforced plastic composites production operation. These facilities were constructed in 1999;

(b) One (1) portable gelcoat applicator, identified as G1, in Building 1 with a maximum resin use design rate of 63.1 pounds per hour, with particulate emissions controlled by a dry filter system, which exhausts to stack F1, F2, or F3. Under 40 CFR 63, Subpart WWWW, the one (1) portable gelcoat applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1990;

(c) One (1) filament winding bath, identified as FWB1, located in Building ~~4~~ **1** with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected

filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the ~~filament~~ **open molding** winding applicators are considered affected ~~filament~~ **open molding** winding units. These facilities were constructed in 1999;

~~(e)~~ **(f)** One (1) portable nonatomized resin applicator, identified as CPC4, with a maximum resin use design rate of 213 pounds per hour, located in Building 4 with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

~~(f)~~ **(g)** One (1) mold repair and prep booth for sanding and waxing metal molds, identified as FCG1, with a maximum resin use design rate of 43.1 pounds per hour, located in Building 1, with no external exhaust, and constructed in 1999. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

~~(g)~~ **(h)** One (1) portable nonatomized resin applicator, identified as FCR1, located in Building 1 with a maximum resin use design rate of 25 pounds per hour, with emissions exhausted to stack F4. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999; and

~~(h)~~ **(j)** Two (2) fiberglass resin storage tanks, identified as T1 and T2, with capacities of 5,000 gallons each. Under 40 CFR 63, Subpart WWWW, the two (2) resin storage tanks are considered existing HAP-containing materials storage units. These storage tanks were constructed in 1999.

(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]

The VOC emissions from the use of paints, coatings, resins, gelcoats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, **FWSH5**, and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(a)~~ **(k)** One (1) paint booth identified as PB1, with a maximum design rate of 6 metal lids/hr, located in Building 4 with particulate emissions controlled by a dry filter system which exhausts to stacks F5 and F6. This facility was constructed in 1999.

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

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

The VOC emissions from the use of paints, coatings, resins, gelcoats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, **FWSH5,** and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(a)~~ **(i)** One (1) pulverizer, identified as RP3, constructed in 2000, with maximum rate of production of 949 lbs/hour of Polyethylene pieces, using a cyclone as control and a high efficiency return air system directed to a bag filter, or which exhausts to the atmosphere through stack RP3. This facility was constructed in 1999;

~~(b)~~ **(l)** One (1) hand grinding booth, identified as CB1, with a maximum design capacity of 2.08 tons of fiberglass/hr, with particulate emissions controlled by a dry filter, which exhausts inside the building. This facility was constructed in 1999;

~~(c)~~ **(m)** One (1) sand blasting booth, identified as CB2, with a maximum design capacity of 0.5 tons of blasting material/hr, with particulate emissions controlled by a dry filter system, which exhausts inside the building. This facility was constructed in 1999; and

~~(d)~~ **(p)** One hand grinding booth, identified as CB3, with a maximum grinding rate of 50 lbs per hour, exhausting to a 48" fan utilizing fabric filters, and approved in 2012 for construction, **located in building 4.**

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

~~(a)~~ **(b)** Degreasing operations that do exceed 145 gallons per 12 months and not subject to 40 CFR 63 Subpart T [326 IAC 8-3-2] [326 IAC 8-3-5]. The degreasing unit is used only for maintenance activities.

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

326 IAC 8-3-5 Cold cleaner degreaser operation and control was repealed, and 326 IAC 8-3-2 was revised on January 30, 2013. These rules are required in Condition D.4.1 and D.4.2, which reflect the old version of the rules. Therefore, these conditions have been revised to reflect the current version of the rules:

~~D.4.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-5]~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for the degreasing operations, the Permittee shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

~~(B) the solvent is agitated; or~~

~~(C) the solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

~~D.4.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:~~

~~(a) equip the cleaner with a cover;~~

~~(b) equip the cleaner with a facility for draining cleaned parts;~~

~~(c) close the degreaser cover whenever parts are not being handled in the cleaner;~~

~~(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~

~~(e) provide a permanent, conspicuous label summarizing the operation requirements;~~

~~(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

D.4.1 Cold cleaner degreaser control equipment and operating requirements

(a) Pursuant to 326 IAC 8-3-2(a) (Cold cleaner degreaser control equipment and operating requirements), the Permittee shall ensure that the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

(a) Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) On and after January 1, 2015, the following record keeping requirements shall apply:

(1) The Permittee shall maintain each of the following records for each solvent purchased for use in the cold cleaner degreaser operation:

(A) The name and address of the solvent supplier.
(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
(C) The type of solvent purchased.
(D) The total volume of the solvent purchased.
(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.4.3 Record Keeping Requirements

To document the compliance status with Condition D.4.2(b), all records shall be maintained in accordance with Section C. Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

The monthly calculations required in Condition D.6.4(a)(5) to demonstrate compliance on an equivalent emission mass basis has been deleted since the VOC limit in Condition D.6.1 is in tons per twelve month period and non-compliant resins or gel coats are not an issue in this condition.

SECTION D.6 CHANGES:

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(a)~~ **(e)** One (1) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the **open molding** ~~filament~~ winding applicator is considered an existing affected ~~filament~~ **open molding** winding unit. Note: The four (4) chop-hoop **open molding** winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

~~(b)~~ **(n)** One (1) resin transfer molding process, identified as RTM1, with a maximum resin use design rate of 214 pounds of resin per hour with no direct external exhaust. This facility was constructed in 2008. Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing affected closed molding operation; ~~and~~

~~(c)~~ **(o)** One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4,

using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation**; and**~~.~~

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

*** * ***

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

D.6.1 PSD Minor Limit [326 IAC 2-2]

The VOC emissions from the use of paints, coatings, resins, gelcoats, catalysts and solvents at the fiberglass parts manufacturing operation, including: Section D.1 units HL1, CP1, CP2, CP3, G1, FWB1, FWSH1 through FWSH3, CPC4, FCG1, and FCR1; in conjunction with Section D.2 unit, PB1; in conjunction with Section D.4 Insignificant Degreasing Operations, and in conjunction with Section D.6 units RTM1, FWSH4, **FWSH5,** and CPC5 shall be limited to a combined total of less than two hundred forty-seven (247) tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition renders the requirements of 326 IAC 2-2 not applicable for VOCs.

D.6.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.6.1.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat.

(2) The monomer content of each resin and gel coat used.

(3) The amount of resin and gel coat used on monthly basis.

(4) Method of application and other emission reduction techniques for each resin and gel coat used;

~~(5) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month~~

SECTION E.1 CHANGES:

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

(a) Lamination area in Building 1 consisting of: One (1) hand layup operation, identified as HL1, with no direct exhaust and three (3) nonatomized resin flow coat applicators, identified as CP1, CP2, and CP3, respectively. Each nonatomized resin flow coat applicator has a maximum resin use design rate of 240 pounds per hour, with particulate emissions controlled by a dry filter system, exhausted to stacks F1, F2, F3,

F7, and F8 respectively. Under 40 CFR 63, Subpart WWWW, the one (1) hand layup area and the three (3) nonatomized resin flow coat applicators are considered an existing open molding reinforced plastic composites production operation. These facilities were constructed in 1999;

(b) One (1) portable gelcoat applicator, identified as G1, in Building 1 with a maximum resin use design rate of 63.1 pounds per hour, with particulate emissions controlled by a dry filter system, which exhausts to stack F1, F2, or F3. Under 40 CFR 63, Subpart WWWW, the one (1) portable gelcoat applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1990;

(c) One (1) filament winding bath, identified as FWB1, located in Building ~~4~~ **1** with resin applied using a resin bath and with a maximum resin use design rate of 80 pounds per hour. Under 40 CFR 63, Subpart WWWW, the filament winding bath is considered an existing, affected filament winding unit. This facility was constructed in 1999;

(d) Three (3) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicators identified as FWSH1-3, located in Building 1, each applying resin to a mandrel to produce a basin. Each winder has a maximum design rate of 1 basin/hr, with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the ~~filament~~ **open molding** winding applicators are considered affected ~~filament~~ **open molding** winding units. These facilities were constructed in 1999;

(e) One (1) nonatomized **(flowcoater)** chop-hoop **open molding** winding applicator, identified as FWSH4, located in Building 1, applying resin to a mandrel to produce 1 basin/hr. This facility was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, the **open molding** ~~filament~~ winding applicator is considered an existing affected ~~filament~~ **open molding** winding unit. Note: The four (4) chop-hoop **open molding** winding applicators identified as FWSH1-4 operate at a total resin use rate of 638 pounds per hour;

(f) One (1) portable nonatomized resin spray applicator, identified as CPC4, with a maximum resin use design rate of 213 pounds per hour, located in Building 4 with no direct exhaust. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin spray applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(g) One (1) mold repair and prep booth for sanding and waxing metal molds, identified as FCG1, with a maximum resin use design rate of 43.1 pounds per hour, located in Building 1, with no external exhaust, and constructed in 1999. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

(h) One (1) portable nonatomized resin applicator, identified as FCR1, located in Building 1 with a maximum resin use design rate of 25 pounds per hour, with emissions exhausted to stack F4. Under 40 CFR 63, Subpart WWWW, the one (1) portable nonatomized resin applicator is considered an existing open molding reinforced plastic composites production operation. This facility was constructed in 1999;

~~(i)~~ **(j)** Two (2) fiberglass resin storage tanks, identified as T1 and T2, with capacities of 5,000 gallons each. Under 40 CFR 63, Subpart WWWW, the two (2) resin storage tanks are considered existing HAP-containing materials storage units. These storage tanks were constructed in 1999;

~~(j)~~ **(n)** One (1) resin transfer molding process, identified as RTM1, with a maximum resin use design rate of 214 pounds of resin per hour with no direct external exhaust. This facility

was approved for construction in 2008. Under 40 CFR 63, Subpart WWWW, this RTM process is considered an existing affected closed molding operation; ~~and~~

~~(k)~~ **(o)** One portable non-atomized resin spray applicator, identified as CPC5, approved in 2012 for construction, with a maximum resin use rate of 100 lbs per hour, located in building 4, using a 48'' exhaust fan with fabric filter for particulate control. Under 40 CFR 63, Subpart WWWW, the one (1) portable resin applicator (CPC5) is considered an existing open molding reinforced plastic composites production operation**; and**

(q) One (1) nonatomized (flowcoater) chop-hoop open molding winding system equipped with two (2) mandrels, identified as FWSH5, with maximum resin usage rate of 64 pounds of resin per hour, approved in 2014 for construction. Under 40 CFR 63, Subpart WWWW, the open molding winding applicators are considered affected open molding winding units.

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

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 099-34562-00043 and Significant Permit Modification No. 099-34587-00043. The staff recommends to the Commissioner that these Part 70 Minor Source and Significant Permit Modifications be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.

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

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

Appendix A: Emissions Calculations
Styrene Emission (VHAP) and Particulate
From New Fiberglass Manufacturing Operations

Company Name: AK Industries, Inc.
Address City IN Zip: 2055 Pidco Drive, Plymouth, IN 46563
Minor Source Modification: 099-34562-00043
Significant Permit Modification : 099-34587-00043
Reviewer: Aida DeGuzman
Date: 5/23/14

Uncontrolled Potential HAP (Styrene) Emissions

Material	Resin Use Rate (lb/hr)	Resin Use Rate (tons/hr)	Weight % Styrene Monomer or VOC (%)	UEF (lbs monomer/ton resin)	Potential VOC (lb/hr)	Potential VOC/HAP (lb/day)	Potential VOC/HAP (tons/yr)
Chop-Hoop Winding Applicator and Mandrels (FWSH5)	64	0.032	32.0%	68.48	2.19	52.59	9.60
Grand Total							**9.60**

METHODOLOGY

Tons Processed per Hour (tons/hr) = Resin Use Rate (lb/hr) * 2000 lb/ton

Potential VOC Pounds per Hour (lb VOC/hr) = Tons Processed (tons/hr) * Emission Factor (lb/ton)

Potential VOC Pounds per Day (lb VOC/day) = Potential VOC (lb VOC/hr) * 24 (hr/day)

Potential VOC Tons per Year (tpy) = Potential VOC (lb VOC/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 13, 2009), revised on October 5, 2011, to calculate resin and gel coat emissions.

UEF, lb/ton = 0.107 x %styrene x 2000 = 68.48 lb/ton

Material	Resin Use Rate (lb/hr)	Solids %	Transfer Efficiency (%)	PM/PM10/PM2.5 Uncontrolled/Controlled PTE (ton/yr)	PM/PM10/PM2.5 Uncontrolled/Controlled PTE (lb/hr)
Chop-Hoop Winding Applicator and Mandrels (FWSH5)	64	65%	99.9%	0.18	0.04

*The transfer efficiency considered in this permitting action was based upon the transfer efficiency used historically, that was based upon the type of coating used, gun type, spray direction, engineering judgment, and baseline transfer efficiency chart of spray and other coating methods - 90% was selected for operations using air-assisted airless guns, 99.5 to 99.9% was used for flow coating operations and for dip and brush application operations.

METHODOLOGY

PTE of PM/PM10/PM2.5, tons/yr = resin usage rate, lb/hr * wt % solids * (1-transfer efficiency) * 8760 hrs/yr * ton/2000 lbs

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: Rosalind Marshall
AK Industries
2055 Pidco Dr
Plymouth, IN 46563

DATE: June 12, 2014

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

SUBJECT: Final Decision
Title V - Minor Source Modification
099 - 34562 - 00043

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:
John Sabo, President
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.

Mail Code 61-53

IDEM Staff	LPOGOST 6/12/2014 AK Industries, Inc. 099 - 34587 - 00043 draft / 099 - 34562 - 00043 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**

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		Rosalind Marshall AK Industries, Inc. 2055 Pidco Dr Plymouth IN 46563 (Source CAATS) Via confirmed delivery									
2		John Sabo President AK Industries, Inc. 2055 Pidco Dr Plymouth IN 46563 *(RO CAATS)*									
3		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 *(Local Official)*									
4		Plymouth Public Library 201 North Center Street Plymouth IN 46563-2103 *(Library)*									
5		Pymouth City Council and Mayors Office 124 N Michigan St Plymouth IN 46563 *(Local Official)*									
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)*									
9											
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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