



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: July 8, 2014

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

Source Name: Polygon Company

Permit Level: Federally Enforceable State Operating Permit (FESOP)
Administrative Amendment

Permit Number: 141-34563-00062

Source Location: 103 Industrial Park Drive and Tennessee Street, Walkerton, Indiana

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

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

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 34563.

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

(continues on next page)

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

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

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

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

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Polygon Company
103 Industrial Park Drive
and Tennessee Street, Walkerton, IN 46574**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F141-25464-00062	
Issued by: <i>Original document signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 25, 2008 Expiration Date: April 25, 2018

Administrative Amendment No.: F141-32441-00062 issued on November 16, 2012

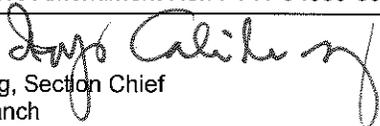
Administrative Amendment No.: F141-34563-00062	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 8, 2014 Expiration Date: April 25, 2018

TABLE OF CONTENTS

A. SOURCE SUMMARY	5
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	8
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	18
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Overall Source Limit [326 IAC 2-8]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.7 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.8 Compliance Requirements [326 IAC 2-1.1-11]	

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 25

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 FESOP and New Source Toxics Control [326 IAC 2-8] [326 IAC 2-4.1-1]
- D.1.3 Particulate [326 IAC 6.5-1-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2]
[326 IAC 8-1-4]
- D.1.6 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- D.1.7 Monitoring
- D.1.8 Dust Collector Inspections
- D.1.9 Parametric Monitoring
- D.1.10 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 31

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate [326 IAC 6.5-1-2]

Compliance Determination Requirements

- D.2.2 Particulate Control

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 33

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.3.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]
- D.3.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-5]

Certification Form 35
Emergency Occurrence Form 36
Quarterly Report Forms 38
Quarterly Deviation and Compliance Monitoring Report Form 42

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 2-8-3(b)]

The Permittee owns and operates a stationary fiberglass reinforced plastic tubing manufacturing facility.

Source Address:	Plant 1 - 103 Industrial Park Drive, Walkerton, IN 46574 Plant 2 - Tennessee Street, Walkerton, IN 46574
General Source Phone Number:	219-586-3145
SIC Code:	3082 (Unsupported Plastics Profile Shapes) and 3089 (Plastics Products, Not Elsewhere Classified)
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

The following emission units are located at the Industrial Park Drive facility:

- (a) Seven (7) pultrusion lines, identified as PL1 through PL7, constructed in 1994, with a maximum capacity of eighty-three and eight-tenths (83.8) pounds per hour, with particulate emissions controlled by a common dust collector that exhausts inside the building, and with VOC emissions exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat fifty (50) tubes per hour, with dry filters for particulate control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of fifty-three and five-tenths (53.5) pounds per hour, with dry filters for particulate control, and exhausting to stacks V7 and V8.
- (d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of forty-seven (47.0) pounds per hour using no controls, and exhausting to stacks V9 and V10.
- (e) One (1) powder coating spray booth, identified as PC-1, approved for construction in 2012, with a maximum capacity of 7.94 pounds of powder coating per hour and 360 pounds of fiberglass reinforced plastic tubing per hour, using an integral dust cartridge collector for product recovery, and exhausting to the indoors.

- (f) One (1) infrared powder coating oven, identified as PC-2, approved for construction in 2012, uncontrolled, and exhausting to the indoors.

The following units are located at the Tennessee Street facility:

- (a) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, using no controls, and exhausting to stack V6.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

The following insignificant activities are located at the Industrial Park Drive facility:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and that are not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Research and Development operations, producing parts for new product testing and marketing research samples for a product designated as continuous fiber thermoplastic (CFT).
- (c) Eight (8) rubber encapsulated fiberglass strand manufacturing lines, with emissions below exemption levels as defined in 326 IAC 2-1.1-3.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour including the following:

- (1) Three (3) natural gas-fired curing ovens,
- (2) Four (4) radiant heaters,
- (3) Fifteen (15) space heaters, and
- (4) Three (3) air make-up units,

These units have a combined total heat input capacity of approximately 9.0 MMBtu per hour. [326 IAC 6.5-1-2(a)]

Two (2) natural gas-fired indirect process heaters with heat input of 0.01 and 0.03 MMBtu per hour. [326 IAC 6.5-1-2(b)(3)]

- (e) Various machining operations where aqueous cutting coolant continuously floods the machining interface including the following:
 - (1) Eleven (11) grinders,
 - (2) Six (6) auto saws,
 - (3) Eight (8) chop saws,
 - (4) Eight (8) small grinding machines,
 - (5) Seven (7) lathes,
 - (6) Three (3) bandsaws,
 - (7) Twelve (12) dielectric testers,
 - (8) Twelve (12) drill presses,
 - (9) Eight (8) computerized mills,
 - (10) One (1) air rotation unit,
 - (11) Two (2) fiberglass winding lines,
 - (12) Two (2) wet cutting/grinding lines and
- (f) Three (3) spindle winder attachments and one (1) 6-spindle winder, one (1) fiberglass

trimming and grinding area known as the Large Filament Wind Grinding Area, with a maximum process weight rate of 17 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]

- (g) One (1) fiberglass trimming and grinding area with a maximum process weight rate of 254 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]
- (h) Seven (7) electric ovens for fiberglass curing and drying, emitting approximately 10.93 pounds per day of any combination of HAPs.
- (i) One (1) 6-spindle winder and two (2) fiberglass winding lines with trimmers and grinders, where aqueous cutting coolant continuously floods the machining interface, identified as the Stephens Filament Winding Area (F3), with a maximum capacity of 3,500 pounds per hour, exhausting to stacks SEF1 through SEF4.
- (j) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

The following insignificant activities are located at the Tennessee Street facility:

- (k) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour
 - (1) Five (5) natural gas-fired curing ovens, exhausting through Stacks identified as TSO-1 through TSO-5.
- (l) Various machining operations where aqueous cutting coolant continuously floods the machining interface including:
 - One (1) chop saw
- (m) One (1) electric oven for fiberglass curing and drying, emitting approximately 1.56 pounds per day of any combination of HAPs, exhausting through TSO-6.
- (m) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F141-25464-00062, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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 2-8-6] [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 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 April 15 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
- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F141-32134-00062 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

- (2) revised, or
- (3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) **Emission Trades [326 IAC 2-8-15(b)]**
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 2-8-15(b).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**
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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 thirty 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).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-4][326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Risk Management Plan [326 IAC 2-8-4] [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.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.16 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:

The following emission units are located at the Industrial Park Drive facility:

- (a) Seven (7) pultrusion lines, identified as PL1 through PL7, constructed in 1994, with a maximum capacity of eighty-three and eight-tenths (83.8) pounds per hour, with particulate emissions controlled by a common dust collector that exhausts inside the building, and with VOC emissions exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat fifty (50) tubes per hour, with dry filters for particulate control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of fifty-three and five-tenths (53.5) pounds per hour, with dry filters for particulate control, and exhausting to stacks V7 and V8.
- (d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of forty-seven (47.0) pounds per hour, using no controls, and exhausting to stacks V9 and V10.
- (e) One (1) powder coating spray booth, identified as PC-1, approved for construction in 2012, with a maximum capacity of 7.94 pounds of powder coating per hour and 360 pounds of fiberglass reinforced plastic tubing per hour, using an integral dust cartridge collector for product recovery, and exhausting to the indoors.
- (f) One (1) infrared powder coating oven, identified as PC-2, approved for construction in 2012, uncontrolled, and exhausting to the indoors.

The following units are located at the Tennessee Street facility:

- (a) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, using no controls, and exhausting to stack V6.

Insignificant Activities

The following insignificant activities are located at the Industrial Park Drive facility:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and that are not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Research and Development operations, producing parts for new product testing and marketing research samples for a product designated as continuous fiber thermoplastic (CFT).
- (c) Eight (8) rubber encapsulated fiberglass strand manufacturing lines, with emissions below exemption levels as defined in 326 IAC 2-1.1-3.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pultrusion Lines (PL1 through PL7)
The input of resins, catalysts, and solvents for each pultrusion line shall be limited such that the total potential to emit (PTE) of Volatile Organic Compounds (VOC) for all seven pultrusion lines (PL1 through PL7) is less than twenty-five (25) tons per consecutive 12 month period, with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, percentage of volatile organic compounds, and method of application shall be recorded for each resin, catalyst, and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin, catalyst, and solvent by the emission factor that is appropriate for the percentage of volatile organic compounds or styrene monomer content, and the method of application, and summing the emissions for all resins, catalysts, and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.
 - (2) The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.
- (b) Resin Dip Tanks (RD1 through RD9)
The total usage of volatile organic compound (VOC) in the nine (9) resin dip tanks, identified as RD1 through RD9, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.2 FESOP and New Source Toxics Control [326 IAC 2-8] [326 IAC 2-4.1-1]

Pursuant to FESOP 141-17842-00062, issued on November 5, 2003, the total input of resins, gelcoats, catalysts, and solvents at this source shall be limited such that the potential to emit (PTE) of a single Hazardous Air Pollutant (HAP) shall be less than 9.9 tons per twelve (12) consecutive month period, and the potential to emit of any combination of HAPs shall be less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (1) Monthly usage by weight, percentage of hazardous air pollutants (HAPs), and method of application shall be recorded for each gelcoat, resin, catalyst, and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each gelcoat, resin, catalyst, and solvent by the emission factor that is appropriate for the percentage of volatile organic compounds or styrene monomer content, and the method of application, and summing the emissions. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

- (2) The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other HAP emitting compounds shall be 100% of the input volatile organic compounds.

Combined with the HAP emissions from combustion facilities and the insignificant activities not listed in this section, the emissions from the source are limited to less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs. Compliance with these limits renders the requirements of 40 CFR 63, Subpart WWWW, 40 CFR 63, Subpart PPPP, 326 IAC 2-4.1-1 (MACT), and 326 IAC 2-7 (Part 70 Program) not applicable.

D.1.3 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(h), particulate from the spray booth, identified as B1, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6.5-1-2(h), particulate from the gel coat spray booth, identified as B2, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each pultrusion lines, identified as PL1 through PL7, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (d) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the powder coating spray booth, identified as PC1, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions 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 and HAP data sheets or Material Safety Data Sheets (MSDS) for each gelcoat, resin, catalyst, and solvent used in the reinforced plastics composites manufacturing operations.
- (b) The VOC and HAP emissions for gel coats, resins, catalysts, and solvents shall be calculated by multiplying the usage of each gel coat, resin, catalyst, and solvent 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," Composites Fabricators Association, July 23, 2001, or its updates, as follows:

- (1) VOC/HAP emissions from resins and gelcoats:
 $E_R = (F_1 * R * 1 \text{ ton}/2,000 \text{ lbs})$, where:
 E_R = VOC/HAP emissions from resins and gelcoats (tons)
 F_1 = Emission factor (lbs emitted per ton of resin or gelcoat used) *
 R = Total amount of resin and gelcoat used (tons)
- (2) VOC/HAP from catalysts, solvents, and other VOC/HAP:
 $E_O = (F_3 * V * K * 1 \text{ ton}/2,000 \text{ lbs})$, where:
 E_O = VOC/HAP emissions (tons)
 F_3 = Emission factor of 1.0 (in absence of other data, assume all VOC/HAP is emitted)
 V = VOC/HAP content (weight percent or lb/gal, from applicable MSDS sheet)
 K = Total amount of catalyst, solvents, mold release agents and other VOC/HAP (lbs or gallons)
- (3) Total VOC/HAP emissions in tons = $E_R + E_O$

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

D.1.6 Particulate Control

- (a) In order to comply with Conditions D.1.3(c) and D.1.3(d), the dust collector and integral dust cartridge collector shall be in operation at all times when the pultrusion lines, identified as PL1 through PL7, and the powder coating spray booth, identified as PC1, are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling particulate emissions from spray booths B1 and B2. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks V4, V5, V7, and V8 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a 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 stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Dust Collector Inspections

An inspection shall be performed semi-annually on the dust collector associated with the pultrusion lines, identified as PL1 through PL7.

D.1.9 Parametric Monitoring

The Permittee shall record the pressure drop across the integral dust cartridge collector used in conjunction with the powder coating spray booth, at least once per day when the process is in operation. When for any one reading, the pressure drop across the integral dust cartridge collector is outside the normal range, the Permittee shall take reasonable response. The normal range is a pressure drop between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.10 Broken or Failed Bag Detection

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.11 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1 and D.1.5, 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 limits and the VOC content limits established in Conditions D.1.1 and D.1.5. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
 - (1) The amount, VOC content, and monomer content of each gelcoat, resin, catalyst, and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS), waste manifests, and calculations necessary to verify the type and amount used.
 - (2) The method of application and other emission reduction techniques for each resin and gel coat used.
 - (3) The total VOC usage for each month.

- (4) The calculated total weight of VOC emissions from resin, gel coat, catalyst, and solvent used for each compliance period.
- (b) To document the compliance status with Conditions D.1.2 and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limitations established in Conditions D.1.2 and D.1.5.
 - (1) The amount, monomer content, and HAP content of each gelcoat, resin, catalyst, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The method of application and other emission reduction techniques for each resin and gel coat used.
 - (3) The total HAP usage for each month;
 - (4) The total amount of all single HAPs emitted for each compliance period; and
 - (5) The total amount of a combination of HAPs emitted for each compliance period.
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily inspections of the filters. The Permittee shall include in its daily record when an inspection is not performed and the reason for the lack of inspection, (e.g. the process did not operate that day).
- (d) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (e) To document compliance with Condition D.1.9, the Permittee shall maintain once per day records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 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 being reported. Section C - General Reporting 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 meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

The following insignificant activities are located at the Industrial Park facility:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour including the following:

- (1) Three (3) natural gas fired curing ovens,
- (2) Four (4) radiant heaters,
- (3) Fifteen (15) space heaters, and
- (4) Three (3) air make-up units,

Two (2) natural gas-fired indirect process heaters with heat input of 0.01 and 0.03 MMBtu per hour. [326 IAC 6.5-1-2(b)(3)]

- (e) Various machining operations where aqueous cutting coolant continuously floods the machining interface including the following:

- (1) Eleven (11) grinders,
- (2) Six (6) auto saws,
- (3) Eight (8) chop saws,
- (4) Eight (8) small grinding machines,
- (5) Seven (7) lathes,
- (6) Three (3) bandsaws,
- (7) Twelve (12) dielectric testers,
- (8) Twelve (12) drill presses,
- (9) Eight (8) computerized mills,
- (10) One (1) air rotation unit,
- (11) Two (2) fiberglass winding lines,
- (12) Two (2) wet cutting/grinding lines and

- (f) Three (3) spindle winder attachment and one (1) 6-spindle winder, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, with a maximum process weight rate of 17 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]

- (g) One (1) fiberglass trimming and grinding area with a maximum process weight rate of 254 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]

- (h) Seven (7) electric ovens for fiberglass curing and drying, emitting approximately 10.93 pounds per day of any combination of HAPs.

- (i) One (1) 6-spindle winder and two (2) fiberglass winding lines with trimmers and grinders, where aqueous cutting coolant continuously floods the machining interface, identified as the Stephens Filament Winding Area (F3), with a maximum capacity of 3,500 pounds per hour, exhausting to stacks SEF1 through SEF4.

The following insignificant activities are located at the Tennessee Street facility:

- (k) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour
 - (1) Five (5) natural gas-fired curing ovens, exhausting through stacks identified as TSO-1 through TSO-5.
- (l) Various machining operations where aqueous cutting coolant continuously floods the machining interface including:
 - One (1) chop saw
- (m) One (1) electric oven for fiberglass curing and drying, emitting approximately 1.56 pounds per day of any combination of HAPs, exhausting through TSO-6.

(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 2-8-4(1)]

D.2.1 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the two (2) natural gas-fired indirect process heaters shall not exceed seven-hundredths (0.01) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the natural gas-fired combustion units shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.
- (c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the large filament wind grinding area and the fiberglass trimming and grinding area shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1(c), the dust collectors for particulate control shall be in operation and control emissions from the Large Filament Wind Grinding Area and the fiberglass trimming and grinding area at all times that these facilities are in operation.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

The following insignificant activities are located at the Industrial Park Drive facility:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(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 2-8-4(1)]

D.3.1 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.3.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Polygon Company
Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
Plant 2 - Tennessee Street, Walkerton, Indiana 46574
FESOP Permit No.: F141-25464-00062

**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:

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Polygon Company
Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
Plant 2 - Tennessee Street, Walkerton, Indiana 46574
FESOP Permit No.: F141-25464-00062

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 Describe:
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 DATA SECTION

FESOP Quarterly Report

Source Name: Polygon Company
 Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
 Plant 2 - Tennessee Street, Walkerton, Indiana 46574
 FESOP Permit No.: F141-25464-00062
 Facility: Pultrusion Lines (PL1 through PL7)
 Parameter: VOC Emissions: VOC emissions for resins, catalysts, and solvents shall be calculated by multiplying the usage of each resin, catalyst, and solvent by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, catalyst, and solvent using the emission factors in "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (April, 1999) and "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.
 Limit: Less than 25 tons per twelve month consecutive period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Tons of Material	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	Resins			
Month 1	Catalysts			
Month 1	Solvents			
Month 2	Resins			
Month 2	Catalysts			
Month 2	Solvents			
Month 3	Resins			
Month 3	Catalysts			
Month 3	Solvents			

- 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 DATA SECTION**

FESOP Quarterly Report

Source Name: Polygon Company
Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
Plant 2 - Tennessee Street, Walkerton, Indiana 46574
FESOP Permit No.: F141-25464-00062
Facility: Resin Dip Tanks (RD1 through RD9)
Parameter: VOC Usage
Limit: Less than 25 tons per twelve (12) month consecutive 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 DATA SECTION

FESOP Quarterly Report

Source Name: Polygon Company
 Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
 Plant 2 - Tennessee Street, Walkerton, Indiana 46574
 FESOP Permit No.: F141-25464-00062
 Facility: PL1 - PL7, B1, B2, degreasing, R & D, rubber encapsulated fiberglass strand manufacturing lines
 Parameter: Single HAP Emissions: Single HAP emissions for gelcoats, resins, catalysts, and solvents shall be calculated by multiplying the usage of each gelcoat, resin, catalyst, and solvent by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gelcoat, resin, catalyst, and solvent using the emission factors in "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (April, 1999) and "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.
 Limit: Less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Tons of Material	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	Solvent, Catalysts			
	Gel Coats			
	Resins			
Month 2	Solvent, Catalysts			
	Gel Coats			
	Resins			
Month 3	Solvent, Catalysts			
	Gel Coats			
	Resins			

- 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 DATA SECTION

FESOP Quarterly Report

Source Name: Polygon Company
 Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
 Plant 2 - Tennessee Street, Walkerton, Indiana 46574
 FESOP Permit No.: F141-25464-00062
 Facility: PL1 - PL7, B1, B2, degreasing, R & D, rubber encapsulated fiberglass strand manufacturing lines
 Parameter: Total HAP Emissions: Total HAP emissions for gelcoats, resins, catalysts, and solvents shall be calculated by multiplying the usage of each gelcoat, resin, catalyst, and solvent by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gelcoat, resin, catalyst, and solvent using the emission factors in "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (April, 1999) and "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.
 Limit: Less than 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Tons of Material	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	Solvent, Catalysts			
	Gel Coats			
	Resins			
Month 2	Solvent, Catalysts			
	Gel Coats			
	Resins			
Month 3	Solvent, Catalysts			
	Gel Coats			
	Resins			

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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Polygon Company
Source Address: Plant 1 - 103 Industrial Park Drive, Walkerton, Indiana 46574
Plant 2 - Tennessee Street, Walkerton, Indiana 46574
FESOP Permit No.: F141-25464-00062

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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 an Administrative Amendment to a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name: Polygon Company
Source Location: Plant 1 - 103 Industrial Park Drive, Walkerton, IN 46574
 Plant 2 - Tennessee Street, Walkerton, IN 46574
County: St. Joseph County
SIC Code: 3082 (Unsupported Plastics Profile Shapes)
 3089 (Plastics Products, Not Elsewhere Classified)
Operation Permit No.: F 141-25464-00062
Operation Permit Issuance Date: April 25, 2008
Administrative Amendment No.: 141-34563-00062
Permit Reviewer: Deborah Cole

On May 22, 2014, the Office of Air Quality (OAQ) received an application from Polygon Company related to administrative changes to an existing stationary fiberglass reinforced plastic tubing manufacturing facility.

Source Definition

Source determination was established in F141-25464-00062, issued on April 25, 2008 and modified in Administrative Amendment 141-32441-00062, issued on November 16, 2012.

Existing Approvals

The source was issued FESOP Renewal No. F141-25464-00062 on April 25, 2008. The source has since received Administrative Amendment No. 141-32441-00062, issued on November 16, 2012.

County Attainment Status

The source is located in St Joseph 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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph 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}**
St. Joseph County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

Process/ Emission Unit	Potential To Emit of the Entire Source Before Issuance of the FESOP Administrative Amendment (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Pultrusion Lines (PL1 - PL7) ^{1,2}	3.75	3.75	3.75	0	0	<25.0	0	0	<24.9	<9.9 Styrene
Spray Booth (B1) ^{2,3}	0.56	0.56	0.56	0	0	8.47	0	0		
Gel Coat Booth (B2) ^{2,3}	0.31	0.31	0.31	0	0	4.69	0	0		
Filament Winding (F2) ²	0	0	0	0	0	9.55	0	0		
Resin Dip Tanks (RD1-RD9) ^{1,2}	0	0	0	0	0	<25.0	0	0		
Powder Coating Booth (PC1)	1.04	1.04	1.04	0	0	0	0	0	0	0
Powder Coating IR Cure Oven (PC2)	0	0	0	negl.	negl.	negl.	negl.	0	0	0
Insignificant Activities	7.51	7.51	7.51	0	0	0	0	0	See Note ²	See Note ²
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.40	0.24	3.69	5,309	0.085	0.081 Hexane
Total PTE of Entire Source	13.26	13.51	13.51	0.03	4.40	<72.95	3.69	5,309	<24.9	<9.9 Styrene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA

negl. = negligible

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

**PM_{2.5} listed is direct PM_{2.5}.

¹ In order to render the requirements of 326 IAC 8-1-6 not applicable the source will continue to limit the VOC emissions from the Pultrusion Lines and Resin Dip Tanks to less than 25 tons per year, each.

² The source will continue to limit the combined total and single HAPs emissions to less than 24.9 and 9.9 tons per year, respectively. Compliance with these limits renders 326 IAC 2-7 (Part 70 Program), 326 IAC 2-4.1-1 (MACT), 40 CFR 63, Subpart WWWW, and 40 CFR 63, Subpart PPPP not applicable.

³ Pursuant to 326 IAC 6.5-1-2(h), the source is required to control particulate matter emissions using a dry filter. Therefore, the limited potential to emit PM, PM10, and PM2.5 is after control.

This PTE table is from Administrative Amendment No.: 141-32441-00062, issued on November 16, 2012.

- (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 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) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year.

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Polygon Company on May 22, 2014, requesting to update the descriptive information of the existing emissions units in order to clarify in which plant each unit is located. No units are being removed, added or modified and there is no increase or decrease in the potential to emit of the entire source as a result of this administrative amendment.

Note: This source consists of 2 plants:
Plant 1 - 103 Industrial Park Drive, Walkerton, IN 46574
Plant 2 - Tennessee Street, Walkerton, IN 46574

Additionally, on September 26, 2013, the U.S. Environmental Protection Agency issued a Notice of Violation (NOV) to Polygon Corporation for violation of the Indiana State Implementation Plan (SIP). Specifically, on August 7 and 8, 2013, a certified observer, hired by Polygon, read opacity at the facility's gas oven #3 in accordance with 40 CFR Part 60, Appendix A, Reference Method 9. The observer read opacity greater than 40%, over a six-minute average. This is in violation of the opacity limit established in Polygon's FESOP and this failure to comply with the opacity limit violated the Indiana SIP and the Clean Air Act (CAA) Section 13.

Therefore, as a result of this enforcement action, the source is modifying the stacks associated with the five (5) gas-fired cure ovens and the one (1) electric fiberglass cure oven located at the Tennessee Street facility. For the natural gas-fired ovens, the modifications consist of elevating and increasing the diameter of the stacks as well as adding a damper to each stack. For the electric fiberglass oven, the modification consists of elevating and increasing the diameter of the stack. These modifications to the stacks do not increase or decrease the overall PTE of the source and there are no new, modified or unpermitted units as a result of the modification of the stacks.

"Integral Part of the Process" Determination

An integral to the process determination for the dust cartridge collector to be considered integral to the power coating spray booth (PC-1) was made in Administrative Amendment No.: 141-32441-00062, issued on November 16, 2012.

Enforcement Issues

There are no pending enforcement actions related to this amendment.

Emission Calculations

There are no changes to the potential to emit of this source as a result of this Administrative Amendment.

Permit Level Determination – FESOP Amendment

There are no new, modified or unpermitted emission units being added to this source at this time.

PTE of the Entire Source After Issuance of the FESOP Amendment

There are no changes to the potential to emit of this source as a result of this Administrative Amendment. Therefore, this table reflects the same emissions as the table listed under Status of the Existing Source.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Administrative Amendment (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Pultrusion Lines (PL1 - PL7) ^{1,2}	3.75	3.75	3.75	0	0	<25.0	0	0	<24.9	<9.9 Styrene
Spray Booth (B1) ^{2,3}	0.56	0.56	0.56	0	0	8.47	0	0		
Gel Coat Booth (B2) ^{2,3}	0.31	0.31	0.31	0	0	4.69	0	0		
Filament Winding (F2) ²	0	0	0	0	0	9.55	0	0		
Resin Dip Tanks (RD1-RD9) ^{1,2}	0	0	0	0	0	<25.0	0	0	0	0
Powder Coating Booth (PC1)	1.04	1.04	1.04	0	0	0	0	0	0	0
Powder Coating IR Cure Oven (PC2)	0	0	0	negl.	negl.	negl.	negl.	0	0	0
Insignificant Activities	7.51	7.51	7.51	0	0	0	0	0	See Note ²	See Note ²
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.40	0.24	3.69	5,309	0.085	0.081 Hexane
Total PTE of Entire Source	13.26	13.51	13.51	0.03	4.40	<72.95	3.69	5,309	<24.9	<9.9 Styrene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO _{2e}	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO _{2e}	NA	NA

negl. = negligible

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

**PM_{2.5} listed is direct PM_{2.5}.

¹ In order to render the requirements of 326 IAC 8-1-6 not applicable the source will continue to limit the VOC emissions from the Pultrusion Lines and Resin Dip Tanks to less than 25 tons per year, each.

² The source will continue to limit the combined total and single HAPs emissions to less than 24.9 and 9.9 tons per year, respectively. Compliance with these limits renders 326 IAC 2-7 (Part 70 Program), 326 IAC 2-4.1-1 (MACT), 40 CFR 63, Subpart WWWW, and 40 CFR 63, Subpart PPPP not applicable.

³ Pursuant to 326 IAC 6.5-1-2(h), the source is required to control particulate matter emissions using a dry filter. Therefore, the limited potential to emit PM, PM10, and PM2.5 is after control.

(a) FESOP Status

This amendment to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, HAPs and CO_{2e} from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

- (b) PSD Minor Source – PM
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) Emission Offset Minor Source
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

NSPS

There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed amendment.

NESHAP

There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment.

State Rule Applicability Determination

There are no new state rules applicable to this source as a result of this administrative amendment.

Compliance Determination, Monitoring and Testing Requirements

There are no new compliance, monitoring or testing requirements applicable to this source as a result of this administrative amendment.

Proposed Changes

Pursuant to 326 IAC 2-8-10(a)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change descriptive information concerning the source or an emissions unit, where the revision will not trigger a new applicable requirement.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

SECTION A

SOURCE SUMMARY

...

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities:

The following insignificant activities are located at the Industrial Park Drive facility:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and that are not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Research and Development operations, producing parts for new product testing and marketing research samples for a product designated as continuous fiber thermoplastic (CFT).

- (c) Eight (8) rubber encapsulated fiberglass strand manufacturing lines, with emissions below exemption levels as defined in 326 IAC 2-1.1-3.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour **including the following:**
- (1) ~~Ten (10)~~ **Three (3)** natural gas fired curing ovens,
 - (2) ~~Four (4)~~ radiant heaters,
 - (3) ~~Fifteen (15)~~ space heaters, and
 - (4) ~~Three (3)~~ air make-up units,
- These units have with** a combined total heat input capacity of approximately 9.0 MMBtu per hour. [326 IAC 6.5-1-2(a)]
- ~~(2) One (1) natural gas-fired make-up air heater, identified as SMU-1, with heat input of 1.00 MMBtu per hour. [326 IAC 6.5-1-2(a)]~~
- ~~(3) Two (2) natural gas-fired indirect process heaters with heat input of 0.01 and 0.03 MMBtu per hour. [326 IAC 6.5-1-2(b)(3)]~~
- (e) Various machining operations where aqueous cutting coolant continuously floods the machining interface including **the following:**
- (1) ~~seventeen (17)~~ **Eleven (11)** grinders,
 - ~~one (1) filter press,~~
 - (2) ~~five (5)~~ **Six (6)** auto saws,
 - (3) ~~nine (9)~~ **Eight (8)** chop saws,
 - (4) ~~e~~ **Eight (8)** small grinding machines,
 - (5) ~~s~~ **Seven (7)** lathes,
 - (6) ~~t~~ **Three (3)** bandsaws,
 - (7) ~~t~~ **Twelve (12)** dielectric testers,
 - (8) ~~t~~ **Twelve (12)** drill presses,
 - (9) ~~five (5)~~ **Eight (8)** computerized mills,
 - (10) ~~e~~ **One (1)** air rotation unit,
 - (11) ~~t~~ **Two (2)** fiberglass winding lines,
 - (12) ~~t~~ **Two (2)** wet cutting/grinding lines and ~~one (1) auto deburr.~~
- (f) Three (3) spindle winder attachments and one (1) 6-spindle winder, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, with a maximum process weight rate of 17 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]
- (g) One (1) fiberglass trimming and grinding area, ~~known as the US6,~~ with a maximum process weight rate of 254 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]
- (h) ~~Six (6)~~ **Seven (7)** electric ovens for fiberglass curing and drying, emitting ~~less than twelve and five tenths (12.5)~~ **approximately 10.93** pounds per day of any combination of HAPs.
- (i) One (1) 6-spindle winder and two (2) fiberglass winding lines with trimmers and grinders, where aqueous cutting coolant continuously floods the machining interface, identified as the Stephens Filament Winding Area (F3), with a maximum capacity of 3,500 pounds per hour, exhausting to stacks SEF1 through SEF4.
- (j) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

The following insignificant activities are located at the Tennessee Street facility:

- (k) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour
 - (1) **Five (5)** natural gas-fired curing ovens, **exhausting through stacks identified as TSO-1 through TSO-5.**
- (l) Various machining operations where aqueous cutting coolant continuously floods the machining interface including:
 - One (1)** chop saws,
- (m) ~~Six (6)~~ **One (1)** electric ovens for fiberglass curing and drying, emitting ~~less than twelve and five-tenths (12.5)~~ **approximately 1.56** pounds per day of any combination of HAPs, **exhausting through TSO-6.**
- (n) **Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]**

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

The following insignificant activities are located at the Industrial Park facility:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour **including the following:**
 - (1) ~~Ten (10) natural gas fired curing ovens, four (4) radiant heaters, fifteen (15) space heaters, and three (3) air make-up units, with a combined total heat input capacity of 9.0 MMBtu per hour. [326 IAC 6.5-1-2(a)]~~
 - (1) ~~Ten (10)~~ **Three (3)** natural gas fired curing ovens,
 - (2) ~~Four (4)~~ **Four (4)** radiant heaters,
 - (3) ~~Fifteen (15)~~ **Fifteen (15)** space heaters, and
 - (4) ~~Three (3)~~ **Three (3)** air make-up units,
 - (2) ~~One (1) natural gas-fired make-up air heater, identified as SMU-1, with heat input of 1.00 MMBtu per hour. [326 IAC 6.5-1-2(a)]~~
 - (3) ~~Two (2) natural gas-fired indirect process heaters with heat input of 0.01 and 0.03 MMBtu per hour. [326 IAC 6.5-1-2(b)(3)]~~
- (e) ~~Various machining operations where aqueous cutting coolant continuously floods the machining interface; seventeen (17) grinders, one (1) filter press, five (5) auto saws, nine (9) chop saws, eight (8) small grinding machines, seven (7) lathes, three (3) bandsaws, twelve (12) dielectric testers, twelve (12) drill presses, five (5) computerized mills, one (1) air rotation unit, two (2) fiberglass winding lines, two (2) wet cutting/grinding lines and one (1) auto deburr.~~

(e) Various machining operations where aqueous cutting coolant continuously floods the machining interface including **the following:**

- (1) ~~seventeen (17)~~ **Eleven (11)** grinders,
~~one (1) filter press,~~
- (2) ~~five (5)~~ **Six (6)** auto saws,
- (3) ~~nine (9)~~ **Eight (8)** chop saws,
- (4) ~~e~~ **Eight (8)** small grinding machines,
- (5) ~~s-~~ **Seven (7)** lathes,
- (6) ~~t~~ **Three (3)** bandsaws,
- (7) ~~t~~ **Twelve (12)** dielectric testers,
- (8) ~~t~~ **Twelve (12)** drill presses,
- (9) ~~five (5)~~ **Eight (8)** computerized mills,
- (10) ~~e~~ **One (1)** air rotation unit,
- (11) ~~t~~ **Two (2)** fiberglass winding lines,
- (12) ~~t~~ **Two (2)** wet cutting/grinding lines and
~~one (1) auto deburr.~~

(f) Three (3) spindle winder attachment and one (1) 6-spindle winder, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, with a maximum process weight rate of 17 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]

(g) One (1) fiberglass trimming and grinding area, ~~known as the US6,~~ with a maximum process weight rate of 254 pounds per hour, with particulate emissions controlled with a Torit Donaldson dust collector. [326 IAC 6.5-1-2(a)]

(h) ~~Six (6)~~ **Seven (7)** electric ovens for fiberglass curing and drying, emitting ~~less than twelve and five-tenths (12.5)~~ **approximately 10.93** pounds per day of any combination of HAPs.

(i) One (1) 6-spindle winder and two (2) fiberglass winding lines with trimmers and grinders, where aqueous cutting coolant continuously floods the machining interface, identified as the Stephens Filament Winding Area (F3), with a maximum capacity of 3,500 pounds per hour, exhausting to stacks SEF1 through SEF4.

The following insignificant activities are located at the Tennessee Street facility:

(k) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British Thermal Units per hour

(1) **Five (5)** natural gas-fired curing ovens, **exhausting through stacks identified as TSO-1 through TSO-5.**

(l) Various machining operations where aqueous cutting coolant continuously floods the machining interface including:

One (1) chop saws,

(m) ~~Six (6)~~ **One (1)** electric ovens for fiberglass curing and drying, emitting ~~less than twelve and five-tenths (12.5)~~ **approximately 1.56** pounds per day of any combination of HAPs, **exhausting through TSO 6.**

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 22, 2014. Additional information was received on July 2, 2014.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Gerry McCoige
Polygon Company
103 Industrial Park Drive
Walkerton, IN 46574-0176

DATE: July 8, 2014

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

SUBJECT: Final Decision
Federally Enforceable State Operating Permit (FESOP) Administrative Amendment
141-34563-00062

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:
Scott R. Parker, Ergo Resource Management, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 7/8/2014 Polygon Company 141-34563-00062 FINAL		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Gerry McCoige Polygon Company 103 Industrial Park Drive Walkerton IN 46574-0176 (Source CAATS)										CONFIRMED DELIVERY
2		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
3		Walkerton Town Council 510 Roosevelt Rd. Walkerton IN 56574 (Local Official)										
4		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
5		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
6		Scott R Parker Ergo Resource Management, Inc. 801 N. Huntington Street, Suite # 7 Syracuse IN 46567 (Consultant)										
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