



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: August 20, 2014

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

Source Name: Goldshield Fiberglass, Inc.

Permit Level: Significant Source Modification

Permit Number: 001-34568-00043

Source Location: 2004 Patterson Street, 2079 Patterson Street & 1903 Patterson Street

Type of Action Taken: Modification at an existing source
Revisions to permit requirements

Notice of Decision: Approval - Effective Immediately

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

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34568.

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

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

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

(continues on next page)

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

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

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

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

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



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August 20, 2014

Mr. Jeff Newport
Goldshield Fiberglass, Inc.
2004 Patterson Street
Decatur, IN 46733

Re: 001-34568-00043
Significant Source Modification

Dear Mr. Newport:

Goldshield Fiberglass, Inc. was issued Part 70 Operating Permit Renewal No. T001-32298-00043 on March 8, 2013 for a stationary custom molded fiberglass reinforced product manufacturer located at 2004, 2709, and 1903 Patterson Street, Decatur, Indiana. An application to modify the source was received on May 27, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

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

Plant 43-1

- (a) One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and exhausting to general building ventilation.
- (b) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (c) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (d) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (e) One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.



A State that Works

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

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

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

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

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

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Brian Williams of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Brian Williams or extension 4-5375 or dial (317) 234-5375.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

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



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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Goldshield Fiberglass, Inc.

**2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street
Decatur, Indiana 46733**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Significant Source Modification No.: 001-34568-00043	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 20, 2014

TABLE OF CONTENTS

A. SOURCE SUMMARY	6
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS	11
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.20 Source Modification Requirement [326 IAC 2-7-10.5]	
B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	21
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Stack Height [326 IAC 1-7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-7-6(1)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64]
[326 IAC 3-8]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64]
[326 IAC 3-8] [326 IAC 2-2]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 31

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2-3][326 IAC 8-1-6]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]
- D.1.4 Reinforced Plastics Composites Production [326 IAC 20-56]
- D.1.5 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 Particulate Matter (PM)

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

- D.1.8 Monitoring [40 CFR 64]
- D.1.9 Monitoring

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

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS - Dust Booths 41

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

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

- D.2.4 Visible Emission Notations [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]	
D.2.5 Record Keeping Requirements	
D.3 EMISSION UNIT OPERATION CONDITIONS - Insignificant Activities	43
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]	
Compliance Determination Requirements	
D.3.2 Particulate Matter (PM)	
D.4. EMISSIONS UNIT OPERATION CONDITIONS	44
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.4.1 Volatile Organic Compounds (VOCs) [326 IAC 2-2]	
D.4.2 Particulate Matter (PM) [326 IAC 6-3-2d]	
D.4.3 Particulate Matter (PM) [326 IAC 6-3-2]	
D.4.4 Reinforced Plastics Composites Production [326 IAC 20-56-2]	
D.4.5 Preventative Maintenance Plan [326 IAC 2-7-5(12)]	
Compliance Determination Requirements	
D.4.6 Volatile Organic Compounds (VOCs)	
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]	
D.4.7 Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.4.8 Record Keeping Requirements	
D.4.9 Reporting Requirements	
E.1 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-80-1][40 CFR, Subpart MMMM]	48
E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR, Subpart MMMM]	
E.1.2 Miscellaneous Metal Parts and Products Surface Coating Requirements [326 IAC 20-80-1][40 CFR, Subpart MMMM]	
E.2 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-81-1][40 CFR, Subpart PPPP]	50
E.2.1 General Provisions Relating to NESHAP PPPP [326 IAC 20-1][40 CFR, Subpart PPPP]	
E.2.2 Coating of Plastic Parts and Products NESHAP [326 IAC 20-81-1][40 CFR, Subpart PPPP]	
E.3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-48][40 CFR, Subpart VVVV]	53
E.3.1 General Provisions Relating to NESHAP VVVV [326 IAC 20-1][40 CFR, Subpart VVVV]	
E.3.2 Boat Manufacturing NESHAP [326 IAC 20-48][40 CFR, Subpart VVVV]	
E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-25][40 CFR, Subpart WWWW]	56
E.4.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1][40 CFR, Subpart WWWW]	
E.4.2 Reinforced Plastic Composites Production NESHAP [326 IAC 20-25][40 CFR, Subpart WWWW]	

Certification 59
Emergency Occurrence Report 60
Part 70 Usage Report 62
Quarterly Reports 63
Quarterly Deviation and Compliance Monitoring Report 65

- Attachment A - NESHAP 40 CFR 63, Subpart MMMM
- Attachment B - NESHAP 40 CFR 63, Subpart PPPP
- Attachment C - NESHAP 40 CFR 63, Subpart VVVV
- Attachment D - NESHAP 40 CFR 63, Subpart WWWW

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary custom molded fiberglass reinforced products.

Source Address:	2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	260-728-2476
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This custom molded fiberglass reinforced products company consists of three (3) plants:

- (a) Plant 43-2 is located at 2004 Patterson Street, Decatur, Indiana;
- (b) Plant 43-1 is located at 2709 Patterson Street, Decatur, Indiana; and
- (c) Plant 43-3 is located at 1903 Patterson Street, Decatur, Indiana.

These plants are located on one or more contiguous properties, have the same two-digit SIC code, and are under common ownership. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

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

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

Plant 43-1

- (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

- (b) One (1) spray booth, with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, consisting of the following operations which are mutually exclusive:

- (1) identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment, with a maximum capacity of 375 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (2) identified as PC2-UP, approved for construction in 2013, using a high volume, low pressure (HVLP) spray gun, with a maximum capacity of 100 plastic parts or 0.62 gallons of Urethane Primer per hour.

Under NESHAP 40 CFR 63 Subparts PPPP this source is considered an existing affected source.

- (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a maximum capacity of 459 pounds of resin per hour, and with emissions venting inside. Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

Plant 43-2

- (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an

existing affected source.

- (j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
- (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
 - (4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
 - (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
 - (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
 - (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
 - (8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

Under the NESHAP 40 CFR 63 Subparts MMMM and PPPP the facilities listed above are considered parts of an existing affected source.

- (k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (l) One (1) foam spraying process, identified as F-1, installed in 2009, consisting of product tanks and one spray gun, with a capacity of 1.75 parts per hour, exhausting to the general building ventilation.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (m) One (1) filament winding process, identified as FWP, installed in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Under NESHAP 40 CFR 63 Subpart WWWW, this source is considered an existing affected source.

- (n) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, equipped with dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

Plant 43-1

- (o) One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and exhausting to general building ventilation.
- (p) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (q) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (r) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (s) One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.

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

This stationary source contains the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]
- (d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty-five (25) pounds per day of PM10 including:
 - (1) Repair areas. Under NESHAP 40 CFR 63 Subparts PPPP and WWWW, these areas are considered part of an existing affected source.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour including:

- (1) In building 43-1, six (6) air makeup units, total capacity: 17 million British thermal units per hour.
- (2) In building 43-2, air makeup units, total capacity: 43.44 million British thermal units per hour.
- (f) Closed loop heating and cooling systems.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown or any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) One (1) infrared gel oven, identified as Gel Oven, installed in 1985, exhausting to stacks B-1-7 and B-1-8, capacity: 1250 square feet of fiberglass parts per hour.
- (k) One (1) infrared chop oven, identified as Oven, installed in 1985, exhausting to stacks B-2-15 and B-2-16, capacity: 1250 square feet of fiberglass parts per hour.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T001-32298-00043, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T001-32298-00043 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit

for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
- (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
- (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular

operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8][326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) *at an existing emissions unit*, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(ww) and/or 326 IAC 2-3-1(pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for a project at an existing emissions *unit* shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 43-1

- (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

- (b) One (1) spray booth, with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, consisting of the following operations which are mutually exclusive:

- (1) identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment, with a maximum capacity of 375 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (2) identified as PC2-UP, approved for construction in 2013, using a high volume, low pressure (HVLP) spray gun, with a maximum capacity of 100 plastic parts or 0.62 gallons of Urethane Primer per hour.

Under NESHAP 40 CFR 63 Subparts PPPP this source is considered an existing affected source.

- (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a

maximum capacity of 459 pounds of resin per hour, and with emissions venting inside.

Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

Plant 43-2

- (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

- (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
- (2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
- (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
- (4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
- (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
- (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
- (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
- (8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

Under the NESHAP 40 CFR 63 Subparts MMMM and PPPP the facilities listed above are considered parts of an existing affected source.

- (k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-

1, capacity: 1250 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts Mmmm and Pppp this source is considered an existing affected source.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] [326 IAC 8-1-6]

- (a) Pursuant to the 326 IAC 8-1-6 (Best Available Control Technology) for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:

- (1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the above mentioned emission units shall be no more than 724.0 tons per twelve (12) consecutive month period.

These VOC emissions shall be calculated on a daily basis with the weekly average, based on a six working day week, not to exceed the daily emission rate of 2.41 tons per day.

Compliance with this limit shall be determined based upon the following criteria:

- (A) Weekly usage by weight, monomer content that is VOC, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded.

Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins.

Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit.

For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document.

For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

- (2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) ≤ (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

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

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

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

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

- (5) The listed work practices shall be followed:
- (A) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.
 - (B) For VOC and/or HAP containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (C) All material storage containers shall be kept covered when not in use.
- (b) Pursuant to CP 001-3261-00010, issued on March 11, 1994, BACT for the paint system at Plant 43-2, identified as PS, shall be the use of high volume, low pressure (HVLP) spray guns, and use of coatings with a solid content not less than 49.6% by volume and no more than 3.59 pounds VOC per gallon of coating, less water.
- (c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the spray booth (P1) of Building 43-1, originally planned for construction at Building 43-3, shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.
- (d) Pursuant to Permit No. 001-25023-00043, issued on October 7, 2008, the one (1) paint booth (PB1) at Plant 43-1 shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate emission rate the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one plastic coating (PC2-UP), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, four (4) spray booths (CB1, CB2,

CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 shall be controlled by a dry particulate filter or waterwash, the Permittee shall operate the control device in accordance with the manufacturer's specifications.

D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

(a) Pursuant to 326 IAC 20-48-2, when performing boat manufacturing operations, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
Operation	Application Method	The weighted average HAP content shall not exceed
Pigmented gel coat	Atomized (spray)	33%
Clear gel coat operations	Atomized (spray)	48%
Tooling gel coat	Atomized (spray)	40%
Pigmented gel coat	Nonatomized (nonspray)	40%
Clear gel coat	Nonatomized (nonspray)	55%
Tooling gel coat	Nonatomized (nonspray)	54%

(b) Pursuant to 326 IAC 20-48-3, the Permittee shall operate the Building 43-1 units PC1, PC2, GB2, and LB1 and the Building 43-2 units GB1, GB2, GB3, CB1, CB2, CB3, and CB4 in accordance with the following work practice standards:

- (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (2) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (3) For routine flushing of resin and gel coat application equipment, such as spray guns, flow coaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAP). However, recycled cleaning solvents that contain less than or equal to five (5) percent HAP by weight are considered to contain no HAP for the purposes of this condition. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
- (4) Clean-up rags with solvent shall be stored in closed containers.
- (5) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAP.
 - (B) All production and tooling gel coats that contain HAP.
 - (C) Waste resins and gel coats that contain HAP.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAP.

The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(c) Pursuant to 326 IAC 20-48-4 (Operator Training), the Permittee shall comply with following operator training requirements:

- (1) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (A) All personnel hired shall be trained within fifteen (15) days of hiring.
 - (B) To ensure training goals listed in paragraph (c)(2) of this condition are maintained, all personnel shall be given refresher training annually.
 - (C) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (c)(1)(A) of this condition if written documentation that the employee's training is current is provided to the new employer.
- (2) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (A) Appropriate application techniques.
 - (B) Appropriate equipment cleaning procedures.
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (3) Maintain the following training records on site and available for inspection and review:
 - (A) A copy of the current training program.
 - (B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
- (4) Records of prior training programs and former personnel are not required to be maintained.

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

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

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within (30) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.

- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of the most recent refresher training, whichever is later.

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

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer, and by Conditions D.1.1(a)(1) and (2). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate Matter (PM)

- (a) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the recirculation-type dust blow-off booth shall be operated at all times so that no PM escapes from the two (2) prime spray booths into the sanding room or into the ambient air. This shall be achieved by the use of replacement filters in the exhaust plenums, air recirculation and maintenance of negative pressure inside the dust blow off booth.
- (b) In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation and control emissions from the plastic coating PC2-UP, at all times when the plastic coating booth, PC2-UP is in operation.

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

D.1.8 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) lamination and gel coat booths at Plant 43-1 (PC1, and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, and one (1) paint booth (PB1) at Plant 43-2, stacks (At Plant 43-1: B-1-1 through B-1-3, B-1-9, B-1-11 through B-1-14, C-1-1 through C-1-3, and P1; At Plant 43-2: B-1-1 through B-1-6, B-2-1 through B-2-14, C-3-1, C-3-2, C-3-4, C-3-5, B-4-1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall

take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) The Permittee shall perform daily checks of the water curtain and flow sheets for proper flow with no visible gaps. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or evidence when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the PC2-UP, while the plastic coating (PC2-UP) is in operation. If a condition exists which should result in a response steps, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or evidence when evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount, VOC content of each resin, gel coat, coating and solvent.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The VOC monomer content for resins and gel coats calculated on an equivalent mass basis for each month in which noncompliant resins or gel coats are used.

- (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The average daily weight of VOCs emitted based on calculated weekly emissions and of a six-day working week; and
 - (7) The VOCs emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.7, D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily checks of water curtains and flow sheets, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter 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 meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14):

- (n) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, using dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the three (3) dust booths shall not exceed 3.65 pounds per hour when operating at a process weight rate of 1,680 pounds per hour (0.84 tons per hour).

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirement

D.2.3 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the dust booths exhausting to the filters are in operation.

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

D.2.4 Visible Emissions Notations [40 CFR 64]

- (a) Visible emission notations of stack exhausts (D-1-1, D-1-2, D-2-1, D-2-2, D-2-3, and D-2-4) shall be performed. These notations shall be taken once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.5 Record Keeping Requirements

- (a) To document the compliance requirement with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the dust booths (identified as D-1-1, D-1-2, D-2-1, D-2-2, D-2-3, and D-2-4) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14): Insignificant Activities

- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant trimming shall not exceed 0.551 pounds per hour, when operating at a process weight rate of less than 100 pounds per hour.

Compliance Determination Requirement

D.3.2 Particulate Matter (PM)

The control devices for PM control shall be in operation at all times when the facilities exhausting to the control devices are in operation.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 43-1

- (o) One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and exhausting to general building ventilation.
- (p) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (q) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (r) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.

Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (s) One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the VOC emissions from the use of resins, gelcoats, catalysts, and solvents by the mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 39.90 tons per twelve (12) consecutive months with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit from the 2014 modification to less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 (PSD) not applicable to this 2014 modification.

D.4.2 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 not applicable, particulate from the atomized gel coat application booth (P1GB3) shall be controlled by dry particulate filters at all times that the process is in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from the scuff sanding operation (P1SS) shall not exceed 0.99 pounds per hour when operating at a process weight rate of 0.12 tons per hour.

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

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

D.4.4 Reinforced Plastics Composites Production [326 IAC 20-56-2]

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

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
- (1) All personnel hired shall be trained within (30) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of the most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.4.6 Volatile Organic Compounds (VOCs)

Compliance with the VOC usage limitation in Condition D.4.1 shall be determined based upon the following criteria:

- (a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst, and solvent used in the reinforced plastics composites manufacturing operation. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) VOC emissions from gel coats and resins shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, using the emission factors provided by the "Unified Emission Factors for Open Molding of Composites," American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates. VOC emissions from all other operations shall be calculated by multiplying the usage of each VOC containing solvent and coating by the VOC content of the material.

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

D.4.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Stack P1GB3S while the atomized gel coat application booth is 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 emissions from Stack P1GB3S and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.4.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.1, the Permittee shall maintain the following records in accordance with (1) and (4) below. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after 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 Condition D.4.4, the Permittee shall maintain the following training records:
- (1) A copy of the current training program;
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document the compliance status with Condition D.4.7, the Permittee shall maintain a log of weekly overspray observations, daily filter inspections, and monthly rooftop and nearby ground inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.4.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.4.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)][326 IAC 20-80-1][40 CFR 63, Subpart MMMM]

Emissions Unit Description:

Plant 43 -1

- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

Plant 43-2

- (j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

- (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
- (2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
- (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
- (4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
- (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
- (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
- (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
- (8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

Under the NESHAP 40 CFR 63 Subparts MMMM and PPPP the facilities listed above are considered parts of an existing affected source.

- (k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts M MMM and P PPP this source is considered an existing affected source.

- (l) One (1) foam spraying process, identified as F-1, installed in 2009, consisting of product tanks and one spray gun, with a capacity of 1.75 parts per hour, exhausting to the general building ventilation.

Under NESHAP 40 CFR 63 Subparts M MMM and P PPP this source is considered an existing affected source.

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

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

Pursuant to 40 CFR 63.3901, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the surface coating operations, as specified in Table 2 of 40 CFR 63, Subpart M MMM in accordance with schedule in 40 CFR 63 Subpart M MMM.

E.1.2 Miscellaneous Metal Part and Products Surface Coating Requirements [326 IAC 20-80-1][40 CFR Part 63, Subpart M MMM]

The Permittee which engages in the surface coating of miscellaneous metal parts and products shall comply with the following provisions of 40 CFR 63, Subpart M MMM (included as Attachment A of this permit):

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881 (a)-(c)(e)(1)-(2)
- (3) 40 CFR 63.3882 (a)(b)(e)
- (4) 40 CFR 63.3883 (b)(d)
- (5) 40 CFR 63.3890 (b)(c)
- (6) 40 CFR 63.3891 (a)(b)
- (7) 40 CFR 63.3892 (a)
- (8) 40 CFR 63.3893 (a)
- (9) 40 CFR 63.3900 (a)(1)(b)
- (10) 40 CFR 63.3901 (e)(2)
- (11) 40 CFR 63.3910 (a)-(c)(8)(ii)(c)(10)
- (12) 40 CFR 63.3920 (a)(1)-(6)
- (13) 40 CFR 63.3930 (a)-(c)(3)(d)-(g)(j)
- (14) 40 CFR 63.3931
- (15) 40 CFR 63.3940
- (16) 40 CFR 63.3941
- (17) 40 CFR 63.3942
- (18) 40 CFR 63.3950
- (19) 40 CFR 63.3951
- (20) 40 CFR 63.3952
- (21) 40 CFR 63.3980
- (22) 40 CFR 63.3981
- (23) Table 2
- (24) Table 3
- (25) Table 4

SECTION E.2 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-81-1] [40 CFR 63, Subpart PPPP]

Emissions Unit Description:

Plant 43-1

- (b) One (1) spray booth, with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, consisting of the following operations which are mutually exclusive:

- (2) identified as PC2-UP, approved for construction in 2013, using a high volume, low pressure (HVLP) spray gun, with a maximum capacity of 100 plastic parts or 0.62 gallons of Urethane Primer per hour.

Under NESHAP 40 CFR 63 Subparts PPPP this source is considered an existing affected source.

- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

Plant 43-2

- (j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

- (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
- (2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
- (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
- (4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
- (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
- (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
- (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard

cubic feet per minute.

- (8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP the facilities listed above are considered parts of an existing affected source.

- (k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

- (l) One (1) foam spraying process, identified as F-1, installed in 2009, consisting of product tanks and one spray gun, with a capacity of 1.75 parts per hour, exhausting to the general building ventilation.

Under NESHAP 40 CFR 63 Subparts MMMM and PPPP this source is considered an existing affected source.

Insignificant Activities:

- (e) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty-five (25) pounds per day of PM10 including:

- (1) Repair areas. Under NESHAP 40 CFR 63 Subparts PPPP and WWWW, these areas are considered part of an existing affected source.

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

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

Pursuant to 40 CFR 63.4480, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart PPPP in accordance with schedule in 40 CFR 63 Subpart PPPP.

E.2.2 Coating of Plastic Parts and Products NESHAP [326 IAC 20-81-1][40 CFR Part 63, Subpart PPPP]

The Permittee which engages in the surface coating of plastic parts and products shall comply with the following provisions of 40 CFR 63, Subpart PPPP (included as Attachment B of this permit):

- | | |
|------|--|
| (1) | 40 CFR 63.4480 |
| (2) | 40 CFR 63.4481(a)(1)(2)(5)(b)(c)(d)(e) |
| (3) | 40 CFR 63.4482 |
| (4) | 40 CFR 63.4483(b)(d) |
| (5) | 40 CFR 63.4490(b)(c) |
| (6) | 40 CFR 63.4491(a)(b) |
| (7) | 40 CFR 63.4492(a) |
| (8) | 40 CFR 63.4493(a) |
| (9) | 40 CFR 63.4500(a)(1)(b) |
| (10) | 40 CFR 63.4501 |
| (11) | 40 CFR 63.4510 |

- (12) 40 CFR 63.4520 (a)
- (13) 40 CFR 63.4530(a)(b)(c)(1)-(3)(d)(f)(h)
- (14) 40 CFR 63.4531
- (15) 40 CFR 63.4540
- (16) 40 CFR 63.4541
- (17) 40 CFR 63.4542
- (18) 40 CFR 63.4550
- (19) 40 CFR 63.4551
- (20) 40 CFR 63.4552
- (21) 40 CFR 63.4580
- (22) 40 CFR 63.4581
- (23) Table 2
- (24) Table 3
- (25) Table 4
- (26) Appendix A

SECTION E.3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-48] [40 CFR 63, Subpart VVVV]

Emissions Unit Description:

Plant 43-1

- (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

- (b) One (1) spray booth, with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, consisting of the following operations which are mutually exclusive:

- (1) identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment, with a maximum capacity of 375 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a maximum capacity of 459 pounds of resin per hour, and with emissions venting inside. Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

Plant 43-2

- (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

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

E.3.1 General Provisions Relating to NESHAP VVVV [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.5680, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart VVVV in accordance with schedule in 40 CFR 63 Subpart VVVV.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

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

E.3.2 Boat Manufacturing NESHAP [326 IAC 20-48][40 CFR Part 63, Subpart VVVV]

The Permittee which engages in boat manufacturing shall comply with the following provisions of 40 CFR 63, Subpart VVVV (included as Attachment C of this permit):

- (1) 40 CFR 63.5680
- (2) 40 CFR 63.5683
- (3) 40 CFR 63.5689
- (4) 40 CFR 63.5692(b)
- (5) 40 CFR 63.5695
- (6) 40 CFR 63.5698(a)(b)(d)
- (7) 40 CFR 63.5701(a)(b)
- (8) 40 CFR 63.5704(a)(b)
- (9) 40 CFR 63.5707
- (10) 40 CFR 63.5710
- (11) 40 CFR 63.5713
- (12) 40 CFR 63.5714
- (13) 40 CFR 63.5728(a)
- (14) 40 CFR 63.5731
- (15) 40 CFR 63.5743
- (16) 40 CFR 63.5746
- (17) 40 CFR 63.5749
- (18) 40 CFR 63.5752
- (19) 40 CFR 63.5753
- (20) 40 CFR 63.5755
- (21) 40 CFR 63.5758
- (22) 40 CFR 63.5761
- (23) 40 CFR 63.5764 (a)(b)(c)
- (24) 40 CFR 63.5767 (a)(b)(c)
- (25) 40 CFR 63.5770
- (26) 40 CFR 63.5773
- (27) 40 CFR 63.5776
- (28) 40 CFR 63.5779
- (29) Table 1
- (30) Table 2
- (31) Table 3

- (32) Table 5
- (33) Table 6
- (34) Table 7
- (35) Table 8

SECTION E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-25] [40 CFR 63, Subpart WWWW]

Emissions Unit Description:

Plant 43-1

- (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

Under NESHAP 40 CFR 63 Subpart VVVV this source is considered an existing affected source.

- (b) One (1) spray booth, with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, consisting of the following operations which are mutually exclusive:

- (1) identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment, with a maximum capacity of 375 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

Plant 43-2

- (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR 63 Subparts VVVV and WWWW this source is considered an existing affected source.

- (m) One (1) filament winding process, identified as FWP, installed in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Under NESHAP 40 CFR 63 Subpart WWWW, this source is considered an existing affected source.

Insignificant Activities

- (d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty-five (25) pounds per day of PM10 including:
- (1) Repair areas. Under NESHAP 40 CFR 63 Subparts PPPP and WWWW, these areas are considered part of an existing affected source.

Plant 43-1

- (p) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S.
- Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (q) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.
- Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (r) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS.
- Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

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

E.4.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.5780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.4.2 Reinforced Plastic Composites Production NESHAP [326 IAC 20-25][40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastic composites production shall comply with the following provisions of 40 CFR 63, Subpart WWWW (included as Attachment D of this permit):

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5787 (c)(d)
- (4) 40 CFR 63.5790
- (5) 40 CFR 63.5795 (b)
- (6) 40 CFR 63.5796
- (7) 40 CFR 63.5797
- (8) 40 CFR 63.5798
- (9) 40 CFR 63.5799 (b)(c)
- (10) 40 CFR 63.5800
- (11) 40 CFR 63.5805 (b)(g)
- (12) 40 CFR 63.5810 (a)(b)
- (13) 40 CFR 63.5835 (a)(b)(c)
- (14) 40 CFR 63.5840
- (15) 40 CFR 63.5860 (a)
- (16) 40 CFR 63.5895 (b)(c)(d)
- (17) 40 CFR 63.5900 (a)(2)-(4)(b)(c)
- (18) 40 CFR 63.5905
- (19) 40 CFR 63.5910 (a)-(d)(f)(g)(i)
- (20) 40 CFR 63.5915 (a)(c)(d)
- (21) 40 CFR 63.5920
- (22) 40 CFR 63.5925
- (23) 40 CFR 63.5930
- (24) 40 CFR 63.5935
- (25) Table 1
- (26) Table 2
- (27) Table 3
- (28) Table 4
- (29) Table 5
- (30) Table 7
- (31) Table 8
- (32) Table 9
- (33) Table 13
- (34) Table 14
- (35) Table 15

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

Source Name: Goldshield Fiberglass, Inc.
Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur,
Indiana 46733
Part 70 Permit No.: T001-32298-00043

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Goldshield Fiberglass, Inc.
Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur,
Indiana 46733
Part 70 Permit No.: T001-32298-00043

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Usage Report (Submit Report Quarterly)

Source Name: Goldshield Fiberglass, Inc.
 Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur,,
 Decatur, Indiana 46733
 Part 70 Permit No.: T001-32298-00043
 Facility: Entire source (Plants 43-1 and 43-2), excluding FWP, F-1, combustion, RTM,
 P1MP, P1GB3, P1RA, and P1HL units
 Parameter: Total VOC emissions
 Limit: Average daily emissions of 2.41 tons per day based on weekly VOC emissions and
 a six (6) -day week

Month: _____ Year: _____

Day	Month 1 VOC Emissions (tons)	Month 2 VOC Emissions (tons)	Month 3 VOC Emissions (tons)	Day	Month 1 VOC Emissions (tons)	Month 2 VOC Emissions (tons)	Month 3 VOC Emissions (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: Goldshield Fiberglass, Inc.
Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur,
Indiana 46733
Part 70 Permit No.: T001-32298-00043
Facility: Entire source (Plants 43-1 and 43-2), excluding combustion, RTM, P1MP, P1GB3,
P1RA, and P1HL units
Parameter: Total VOC emissions
Limit: Less than 724 tons per twelve (12) consecutive month period

Quarter: _____ Year: _____

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

No deviation occurred in this month.

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

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

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

Part 70 Quarterly Report

Source Name: Goldshield Fiberglass, Inc.
 Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur, Decatur, Indiana 46733
 Part 70 Permit No.: T001-32298-00043
 Facility: Plant 43-1 - Mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL)
 Parameter: VOC Emissions
 Limit: The VOC emissions from the use of resins, gelcoats, catalysts, and solvents by the mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 39.90 tons per twelve (12) consecutive months with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

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

Source Name: Goldshield Fiberglass, Inc.
Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur,
Indiana 46733
Part 70 Permit No.: T001-32298-00043

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 a Part 70 Significant Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Goldshield Fiberglass, Inc.
Source Location:	2004, 2709, & 1903 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.:	T 001-32298-00043
Operation Permit Issuance Date:	March 8, 2013
Significant Source Modification No.:	001-34568-00043
Significant Permit Modification No.:	001-34578-00043
Permit Reviewer:	Brian Williams

Source Definition

This custom molded fiberglass reinforced products company consists of three (3) plants:

- (a) Plant 43-2 is located at 2004 Patterson Street, Decatur, Indiana;
- (b) Plant 43-1 is located at 2709 Patterson Street, Decatur, Indiana; and
- (c) Plant 43-3 is located at 1903 Patterson Street, Decatur, Indiana.

These plants are located on one or more contiguous properties, have the same two-digit SIC code, and are under common ownership. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

The above source definition has been carried over from the existing permit renewal No. T 001-32298-00043, issued on March 8, 2013.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 001-32298-00043 on March 8, 2013. The source has since received the following approval:

- (a) Significant Permit Modification No. 001-33347, issued on September 6, 2013.

County Attainment Status

The source is located in Adams County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012 for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

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

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	1,835.9
PM ₁₀	1,837.5
PM _{2.5}	1,837.5
SO ₂	0.17
NO _x	28.29
VOC	1,326.2
CO	23.76
GHGs as CO ₂ e	33,952.7
HAPs	
Single HAP	>10
Total	>25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a 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) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (d) These emissions are based upon TSD to Significant Permit Modification No. 001-34568-00043, issued on September 6, 2013.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Goldshield Fiberglass, Inc. on May 27, 2014, relating to the construction and operation of a new reinforced plastic composite vehicle part production operation to be located in plant 43-1. The finished parts will not undergo surface coating in the existing surface coating booths in plants 43-1 and 43-2. The finished parts will be sent to the customer for surface coating.

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

Plant 43-1

- (a) One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and exhausting to general building ventilation.
- (b) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source

is considered an existing affected source.

- (c) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (d) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (e) One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	18.13
PM ₁₀	18.13
PM _{2.5}	18.13
SO ₂	0
NO _x	0
VOC	74.70
CO	0
Single HAPs	68.07
Total HAPs	72.41

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

- (a) Approval to Construct
 - (i) This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit VOC is greater than twenty-five (25) tons per year before control.
 - (b) This source modification is subject to 326 IAC 2-7-10.5(g)(6), because this modification has a potential to emit greater than ten (10) tons per year of a single HAP and greater than twenty-five (25) tons per year of any combination of HAPs.
- (b) Approval to Operate
 This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification involves significant changes in permit terms or conditions (such as a case by case determination of emission limitations, the addition of applicable NESHAP requirements, and/or significant changes in existing monitoring Part 70 permit terms and conditions).

Permit Level Determination – PSD

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

Process / Emission Unit	Potential to Emit (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs
Mold Preparation Operation	0	0	0	0	0	39.90***	0	0
Gel Coat Booth**	0.71	0.71	0.71	0	0		0	0
Mechanical Resin Application Area	0	0	0	0	0		0	0
Manual Resin Hand Layup Area	0	0	0	0	0		0	0
Scuff Sanding	3.94	3.94	3.94	0	0	0	0	0
Total for Modification	4.65	4.65	4.65	0	0	39.90	0	0
Significant Thresholds	25	15	10	40	40	40	100	75,000 CO ₂ e
Subject to Regulation	---	---	---	---	---	---	---	75,000 CO ₂ e

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

**Pursuant to 326 IAC 6-3-2(d) and to render 326 IAC 2-2 not applicable, the source is required to control particulate matter emissions using dry filters. Therefore, the potential to emit PM, PM₁₀, and PM_{2.5} is after control.

*** Limited VOC PTE to render 326 IAC 2-2 not applicable.

This modification to an existing major PSD stationary source is not major because:

- (a) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD significant thresholds; and
- (b) The emissions increase of GHGs from this modification to an existing major PSD source are less than seventy-five thousand (75,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

(1) VOC
Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year, this source has elected to limit the potential to emit of this modification as follows:

- (a) The VOC emissions from the use of resins, gelcoats, catalysts, and solvents by the mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 39.90 tons per twelve (12) consecutive months with compliance determined at the end of each month.

Note: This is a new emission limit due to this modification and is a Title 1 change.

Compliance with this emission limit will ensure that the potential to emit from this modification is less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 (PSD) not applicable to this 2014 modification.

(2) PM10 and PM2.5
This source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than fifteen (15) tons of PM₁₀ per year and ten (10) tons of direct PM_{2.5} per year. However, the controlled potential to emit PM₁₀ and PM_{2.5} for this modification assuming reasonable control efficiency of 95 percent for the dry filters controlling the gel coat booth is 4.65 tons per year for each pollutant. Therefore, IDEM has determined it is unnecessary to include PM₁₀ and PM_{2.5} emission limits in the permit to render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification. The dry filters will be required to render 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

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

NSPS:

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

NESHAP:

- (b) This modification is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Boat Manufacturing, Subpart VVVV, because the new reinforced plastic composite production operation will not manufacture boats.
- (c) This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Therefore, the new reinforced plastic composite production operation is subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63.5780, Subpart WWWW (326 IAC 20-56). Construction of this source commenced prior to August 2, 2001. Therefore, this is an existing affected source.

The following new equipment is subject to this rule:

- (1) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

- (2) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (3) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5787(c) and (d)
- (4) 40 CFR 63.5790
- (5) 40 CFR 63.5795(b)
- (6) 40 CFR 63.5796
- (7) 40 CFR 63.5797
- (8) 40 CFR 63.5798
- (9) 40 CFR 63.5799(b) and (c)
- (10) 40 CFR 63.5800
- (11) 40 CFR 63.5805(b) and (g)
- (12) 40 CFR 63.5810(a) and (b)
- (13) 40 CFR 63.5835(a), (b), and (c)
- (14) 40 CFR 63.5840
- (15) 40 CFR 63.5860(a)
- (16) 40 CFR 63.5895(b), (c), and (d)
- (17) 40 CFR 63.5900(a)(2), (a)(3), and (a)(4), (b), and (c)
- (18) 40 CFR 63.5905
- (19) 40 CFR 63.5910(a), (b), (c), (d), (f), (g), and (i)
- (20) 40 CFR 63.5915(a), (c), and (d)
- (21) 40 CFR 63.5920
- (22) 40 CFR 63.5925
- (23) 40 CFR 63.5930
- (24) 40 CFR 63.5935
- (25) Tables 1,2, 3, 4, 5,7, 8, 9, 13, 14, and 15
- (26) Appendix A

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

Note: These are existing requirements.

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

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

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Mold Preparation Operation - VOC*	N	-	-	-	100	N	-
Gel Coat Booth - PM	Y Dry Filters	Y 326 IAC 6-3	14.19	0.71	100	N	-
Gel Coat Booth - PM10	Y Dry Filters	N	-	-	100	N	-
Gel Coat Booth - PM2.5	Y Dry Filters	N	-	-	100	N	-
Gel Coat Booth - VOC*	N	-	-	-	100	N	-
Mechanical Resin Application Area - VOC*	N	-	-	-	100	N	-
Manual Resin Hand Layup Area - VOC*	N	-	-	-	100	N	-
Scuff Sanding - PM	N	-	-	-	100	N	-

- = Not applicable

* Pursuant to 40 CFR 64.2(b)(1)(i), these emission units are not subject to CAM because they are subject to NESHAP Subpart WWWW, which was promulgated after November 15, 1990.

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

State Rule Applicability Determination

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

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of a combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to a major source of HAPs specifically regulated by Section 112(d) of the Clean Air Act. Since the facilities at this source are regulated by Section 112(d) (40 CFR 63, Subpart WWWW), the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

Mold Preparation Operation

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

The application of coatings in the mold preparation operation has a transfer efficiency of 100%. As a result, no particulate matter is generated by this operation. In addition, this operation uses less than five (5) gallons of coatings per day. Therefore, pursuant to 326 IAC 6-3-1(b)(15), this operation is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The mold preparation operation is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from this operation is less than twenty-five (25) tons per year.

326 IAC 8 Rules (VOCs)

There are no other VOC Rules that apply to this process.

Atomized Gel Coat Application Booth, Nonatomized Mechanical Resin Application Area, and Manual Resin Hand Layup Operation

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

- (a) Pursuant to 326 IAC 6-3-2(d)(1), particulate from the atomized gel coat application booth shall be controlled by particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.
- (b) The application of resin using fluid impingement technology applicators in the nonatomized mechanical resin application area has a transfer efficiency of 100%. FIT applicators use a flow coat style nozzle to provide continuous streams of resin and catalyst, so minimal particulate is expected to be generated by these applicators. Therefore, pursuant to 326 IAC 6-3-1(b)(14), this process is exempt from this rule because particulate emissions from this resin application unit is less than five hundred fifty one thousandth (0.551) pound per hour.
- (c) The application of resin using hand, brush, and rollers in the manual resin hand layup operation has a transfer efficiency of 100% and will generate minimal particulate emissions. Pursuant to 326 IAC 6-3-1(b)(6) and 326 IAC 6-3-1(b)(8), this process is exempt from this rule because this process uses brush and roll coating.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Pursuant to 326 IAC 8-1-6(3), the proposed atomized gel coat application booth, nonatomized mechanical resin application area, and manual resin hand layup operation, which will each be constructed after June 25, 2006, are not subject to the requirements of 326 IAC 8-1-6, because each process is regulated by 326 IAC 20-56.

326 IAC 8 Rules (VOCs)

There are no other VOC Rules that apply to these processes.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

326 IAC 20-56-2 (Reinforced Plastics Composites Production)

Pursuant to 326 IAC 20-56-2(b), the Permittee shall comply with the following requirements:

- (a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gelcoating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring.

- (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program.
 - (2) A list of the following:
 - (i) All current personnel, by name, that are required to be trained.
 - (ii) The date the person was trained or date of the most recent refresher training, whichever is later.

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

Scuff Sanding Operation

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

The allowable particulate matter (PM) from the scuff sanding operation shall not exceed 0.99 pounds per hour when operating at a process weight rate of 0.12 tons per hour based on the following:

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

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

The maximum uncontrolled particulate emission rate from the scuff sanding operation is 0.90 pounds per hour. Therefore, a control device is not needed to comply with this limit.

Compliance Determination and Monitoring Requirements

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

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

- (a) There are no testing requirements applicable to this proposed modification. The source will demonstrate compliance with the VOC limits by keeping records of their total coating, resin, gelcoat, catalyst, and clean-up solvent usage and VOC contents of each coating, resin, gelcoat, catalyst, and clean-up solvent. VOC emissions from the open molding operations shall be calculated by multiplying the monthly usage of each resin and gelcoat by the emission factor provided in "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 13, 2009, or its updates. VOC emissions from coatings, catalysts, and cleaning solvents, shall be the VOC input, which shall be calculated by multiplying the monthly usage of each solvent by the VOC content of the solvent.
- (b) The compliance monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Atomized Gel Coat Application Booth / Dry Filters	Filter Check	Once per day
	Overspray Observations	Once per week
	Stack Exhaust Observations	Once per month

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

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T 001-32298-00043. Deleted language appears as ~~struck through~~ and new language appears in **bold**:

1. Section A.3 has been updated to include new descriptive information for the proposed emission units.
2. IDEM has revised Condition D.1(a)(1) to clarify that it only applies to the emission units listed in Condition D.1(a). In addition, IDEM has revised the existing Quarterly Reporting Forms to clarify which emission units the forms apply to.
3. Section D.4, which contains the requirements applicable to the proposed emission units has been added to the revised permit.
4. Section E.4 has been revised to include the proposed emission units.
5. A new Quarterly Reporting Form has been included in the permit for reporting the VOC emissions from the proposed emission units.

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

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

...
Plant 43-1

- (o) **One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and exhausting to general building ventilation.**
- (p) **One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**
- (q) **One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**
- (r) **One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**
- (s) **One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.**

...
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] [326 IAC 8-1-6]

- (a) Pursuant to the 326 IAC 8-1-6 (Best Available Control Technology) for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:
 - (1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the ~~total source, excluding FWP, F-1, combustion and RTM,~~ **above mentioned emission units** shall be no more than 724.0 tons per twelve (12) consecutive month period.

...
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 43-1

- (o) **One (1) mold preparation operation, identified as P1MP, approved in 2014 for construction, with a maximum capacity of 0.5 molds per hour, uncontrolled, and**

exhausting to general building ventilation.

- (p) One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (q) One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (r) One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.
- (s) One (1) scuff sanding operation, identified as P1SS, approved in 2014 for construction, using handheld sanders, with a maximum of 0.5 fiberglass parts per hour and a process weight rate of 0.12 tons per hour, uncontrolled, and exhausting to general building ventilation.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the VOC emissions from the use of resins, gelcoats, catalysts, and solvents by the mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 39.90 tons per twelve (12) consecutive months with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit from the 2014 modification to less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 (PSD) not applicable to this 2014 modification.

D.4.2 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 not applicable, particulate from the atomized gel coat application booth (P1GB3) shall be controlled by dry particulate filters at all times that the process is in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from the scuff sanding operation (P1SS) shall not exceed 0.99 pounds per hour when operating at a process weight rate of 0.12 tons per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.4 Reinforced Plastics Composites Production [326 IAC 20-56-2]

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

- (a) **Operator Training.** Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within (30) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of the most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.4.6 Volatile Organic Compounds (VOCs)

Compliance with the VOC usage limitation in Condition D.4.1 shall be determined based upon the following criteria:

- (a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst, and solvent used in the reinforced plastics composites manufacturing

operation. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) VOC emissions from gel coats and resins shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, using the emission factors provided by the "Unified Emission Factors for Open Molding of Composites," American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates. VOC emissions from all other operations shall be calculated by multiplying the usage of each VOC containing solvent and coating by the VOC content of the material.

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

D.4.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Stack P1GB3S while the atomized gel coat application booth is 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 emissions from Stack P1GB3S and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.4.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.1, the Permittee shall maintain the following records in accordance with (1) and (4) below. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after 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 Condition D.4.4, the Permittee shall maintain the following training records:
- (1) A copy of the current training program;

- (2) **A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**
- (c) **To document the compliance status with Condition D.4.7, the Permittee shall maintain a log of weekly overspray observations, daily filter inspections, and monthly rooftop and nearby ground inspections.**
- (d) **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

D.4.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.4.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

...
SECTION E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-25] [40 CFR 63, Subpart WWWW]

Emissions Unit Description:

...
Plant 43-1

- (p) **One (1) atomized gel coat application booth, identified as P1GB3, approved in 2014 for construction, utilizing HVLP gel coat application methods, with a maximum capacity of 0.5 fiberglass parts per hour, equipped with dry filters as overspray control, and exhausting to Stack P1GB3S. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**
- (q) **One (1) nonatomized mechanical resin application area, identified as P1RA, approved in 2014 for construction, utilizing nonatomized fluid impingement technology (FIT) resin application methods, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**
- (r) **One (1) manual resin hand layup operation, identified as P1HL, approved in 2014 for construction, applying resin by hand, brush, and roller, with a maximum capacity of 0.5 fiberglass parts per hour, uncontrolled, and exhausting to Stack P1RAHLS. Under NESHAP 40 CFR 63 Subpart WWWW this source is considered an existing affected source.**

Part 70 Usage Report
(Submit Report Quarterly)

...
Facility: Entire source (Plants 43-1 and 43-2), excluding FWP, F-1, combustion, and RTM, **P1MP, P1GB3, P1RA, and P1HL** units

Part 70 Quarterly Report

...
Facility: Entire source (Plants 43-1 and 43-2), excluding combustion, and RTM, **P1MP, P1GB3, P1RA, and P1HL** units

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

Part 70 Quarterly Report

Source Name: Goldshield Fiberglass, Inc.
Source Address: 2004 Patterson Street, 2709 Patterson Street & 1903 Patterson Street, Decatur, Decatur, Indiana 46733
Part 70 Permit No.: T001-32298-00043
Facility: Plant 43-1 - Mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL)
Parameter: VOC Emissions
Limit: The VOC emissions from the use of resins, gelcoats, catalysts, and solvents by the mold preparation operation (P1MP), gel coat application booth (P1GB3), mechanical resin application area (P1RA), and manual resin hand layup area (P1HL) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 39.90 tons per twelve (12) consecutive months with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this quarter.

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

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

...

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. IDEM has revised the descriptive information in Sections A.3 and D.1 to be consistent throughout the permit.
2. On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition. The rule citation has been changed throughout the permit as follows:

326 IAC 2-7-1~~(34)~~**(35)**
3. IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
4. IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
5. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.
6. IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.
7. IDEM, OAQ has revised Section C - General Record Keeping and General Reporting Requirements to include requirements that are applicable to PSD major sources since this existing source is a major stationary source, under PSD (326 IAC 2-2).
8. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule cites listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in the Facility Descriptions and Section D - Preventative Maintenance Plan.
9. Condition D.2.5 - Record Keeping Requirements has been revised to reference the correct stack exhausts associated with the three (3) dust booths.

...

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

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

Building Plant 43-1

...

Building Plant 43-2:

...

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (ab) **For existing units:**
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance ~~or of initial start-up, whichever is later,~~ to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance ~~or the date of initial startup, whichever is later,~~ the Permittee may extend the

compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

- (bc) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (ed) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**

...

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, **where applicable:**
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.Records of required monitoring information include the following, **where applicable:**
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.

- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

...

- (c) **If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:**
 - (1) **Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:**
 - (A) **A description of the project.**
 - (B) **Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
 - (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
 - (i) **Baseline actual emissions;**
 - (ii) **Projected actual emissions;**
 - (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and**
 - (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
- (d) **If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:**
 - (1) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
 - (2) **Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption**

of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8][**326 IAC 2-2**]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) **Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;**
- (2) **Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and**
- (3) **A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.**

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

...

- (e) **If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**

- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(ww) and/or 326 IAC 2-3-1(pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for a project at an existing emissions *unit* shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

...
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Building Plant 43-1 ... Building Plant 43-2: ...
--

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

...
SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]: ...

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

...

D.2.5 Record Keeping Requirements

- (a) To document the compliance requirement with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the dust booths (identified as D-1-1, D-1-2, D-2-1, D-2-2, D-2-3, and D-2-4 ~~D-3~~) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).

...

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]: Insignificant Activities

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-34568-00043 and Significant Permit Modification No. 001-34578-00043. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams 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) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (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>.

**Appendix A: Emissions Calculations
Summary of Potential Emission Rates
Modification**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patterson Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Uncontrolled Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Combined HAP	Highest Single HAP*
Mold Preparation Operation	0	0	0	0	0	1.99	0	0	0	0
Gel Coat Booth	14.19	14.19	14.19	0	0	22.57	0	0	22.53	18.19
Mechanical Resin Application Area	0	0	0	0	0	17.98	0	0	17.86	17.86
Manual Resin Hand Layup Operation	0	0	0	0	0	32.16	0	0	32.02	32.02
Scuff Sanding	3.94	3.94	3.94	0	0	0	0	0	0	0
Total	18.13	18.13	18.13	0	0	74.70	0	0	72.41	68.07

***Styrene as Determined Below**

Uncontrolled Potential to Emit HAPs (tons/year)			
Emission Units	MMA	Styrene	PTE of Total HAPs
Mold Preparation Operation	0	0	0
Gel Coat Booth	4.34	18.19	22.53
Mechanical Resin Application Area	0	17.86	17.86
Manual Resin Hand Layup Operation	0	32.02	32.02
Scuff Sanding	0	0	0
Total by HAP	4.34	68.07	72.41

Limited Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Combined HAP	Highest Single HAP*
Mold Preparation Operation	0	0	0	0	0	39.90	0	0	39.90	35.56
Gel Coat Booth	0.71	0.71	0.71	0	0		0	0		
Mechanical Resin Application Area	0	0	0	0	0		0	0		
Manual Resin Hand Layup Operation	0	0	0	0	0		0	0		
Scuff Sanding	3.94	3.94	3.94	0	0	0	0	0	0	0
Total	4.65	4.65	4.65	0	0	39.90	0	0	39.90	35.56

***Styrene as Determined Below**

Limited Potential to Emit HAPs (tons/year)			
Emission Units	MMA	Styrene	PTE of Total HAPs
Mold Preparation Operation	4.34	35.56	39.90
Gel Coat Booth			
Mechanical Resin Application Area			
Manual Resin Hand Layup Operation			
Scuff Sanding	0	0	0
Total by HAP	4.34	35.56	39.90

**Appendix A: Emissions Calculations
Summary of Emissions**

Company Name: Goldshield Fiberglass, Inc.
**Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733**
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Uncontrolled Potential to Emit (tpy)								
Process	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	NO _x	CO	GHGs as CO ₂ e
Building 43-1								
Resin and Gelcoat Operations	549.04	549.04	549.04	-	370.40	-	-	
Spray Booth (SB1)	6.90	6.90	6.90	-	9.33	-	-	
Paint Booth (P1)	6.90	6.90	6.90	-	9.33	-	-	
Resin transfer (RTM)	-	-	-	-	22.62	-	-	
Spray Booth (PC2-UP)	5.20	5.20	5.20	-	8.69	-	-	
Building 43-2								
Resin and Gelcoat Operations	986.25	986.25	986.25	-	330.80	-	-	
Paint System (PS)	177.14	177.14	177.14	-	369.72	-	-	
Paint Booth (PB-1)	88.57	88.57	88.57	-	184.86	-	-	
Dust Booths (D-1, D-2, D-3)	1,027.92	1,027.92	1,027.92	-	-	-	-	
*Filament winding process (FWP)	0.00	0.00	0.00	-	26.21	-	-	
Foam Spraying Process (F-1)	0.00	0.00	0.00	-	1.35	-	-	
Combustion	0.53	2.11	2.11	0.17	27.74	1.53	23.30	33,481
Building 43-3								
Reinforced Plastics and Composites Fiberglass Processes	14.19	14.19	14.19	-	74.70	-	-	-
Scuff Sanding	3.94	3.94	3.94	-	-	-	-	-
Total Potential to Emit	2,866.58	2,868.16	2,868.16	0.17	1,435.75	1.53	23.30	33,481

Controlled Potential to Emit (tpy)								
Process	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	NO _x	CO	GHGs as CO ₂ e
Building 43-1								
Resin and Gelcoat Operations	549.04	549.04	549.04	-	370.40	-	-	
Spray Booth (SB1)	6.90	6.90	6.90	-	9.33	-	-	
Paint Booth (P1)	6.90	6.90	6.90	-	9.33	-	-	
Resin transfer (RTM)	-	-	-	-	22.62	-	-	
Spray Booth (PC2-UP)	0.26	0.26	0.26	-	8.69	-	-	
Building 43-2								
Resin and Gelcoat Operations	986.25	986.25	986.25	-	330.80	-	-	
Paint System (PS)	177.14	177.14	177.14	-	369.72	-	-	
Paint Booth (PB-1)	88.57	88.57	88.57	-	184.86	-	-	
Dust Booths (D-1, D-2, D-3)	20.56	20.56	20.56	-	-	-	-	
*Filament winding process (FWP)	0.00	0.00	0.00	-	26.21	-	-	
Foam Spraying Process (F-1)	0.00	0.00	0.00	-	1.35	-	-	
Combustion	0.53	2.11	2.11	0.17	27.74	1.53	23.30	33,481
Building 43-3								
Reinforced Plastics and Composites Fiberglass Processes	0.71	0.71	0.71	-	74.70	-	-	-
Scuff Sanding	3.94	3.94	3.94	-	-	-	-	-
Total Controlled Emissions	1,840.80	1,842.38	1,842.38	0.17	1,435.75	1.53	23.30	33,481

Potential to Emit of HAPs (tpy)	
Ethylbenzene	42.31
Xylene	169.80
Cumene	206.86
Toluene	168.95
MIBK	17.31
Naphthalene	2.48
Formaldehyde	3.38
Styrene	737.41
Methyl Methacrylate	201.21
MDI	1.35
Glycol Ether	0.07
Total HAPs>	1,551.12

* Emissions are updated based on the table used in "Unified Emission Factors" for Opening Molding of Composites, dated July 23, 2001

**Appendix A: Emissions Calculations
Limited Emissions**

Company Name: Goldshield Fiberglass, Inc.
**Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733**
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Limited Potential to Emit (tons/year)								
Process	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	NO _x	CO	GHGs as CO _{2e}
Building 43-1								
Resin and Gelcoat Operations ^(a)	549.04	549.04	549.04	-	724	-	-	
Spray Booth (SB1) ^(a)	6.90	6.90	6.90	-		-	-	
Paint Booth (P1)	6.90	6.90	6.90	-	9.33	-	-	
Resin transfer (RTM)	-	-	-	-	22.62	-	-	
Spray Booth (PC2-UP)	5.20	5.20	5.20	-	8.69	-	-	
Building 43-2								
Resin and Gelcoat Operations ^(a)	986.25	986.25	986.25	-	(a)	-	-	
Paint Booth (PB-1) ^(a)	88.57	88.57	88.57	-	(a)	-	-	
Paint System (PS)	177.14	177.14	177.14	-	369.72	-	-	
Dust Booths (D-1, D-2, D-3)	20.56	20.56	20.56	-	-	-	-	
Filament winding process (FWP)	0.00	0.00	0.00	-	26.21	-	-	
Foam Spraying Process (F-1)	0.00	0.00	0.00	-	1.35	-	-	
Combustion	0.53	2.11	2.11	0.17	27.74	1.53	23.30	33,481
Building 43-3								
Reinforced Plastics and Composites Fiberglass Processes	0.71	0.71	0.71	-	39.90	-	-	-
Scuff Sanding	3.94	3.94	3.94	-	-	-	-	-
Total Potential to Emit	1,845.74	1,847.32	1,847.32	0.17	1,229.55	1.53	23.30	33,481

^(a) Pursuant to 326 IAC 8-1-6, and Permit No.: 001-25023-00043, the VOC emissions are limited to 724.0 tons/yr.

*Potential to Emit of HAPs (tpy)	
Ethylbenzene	42.31
Xylene	169.80
Cumene	206.86
Toluene	168.95
MIBK	17.31
Naphthalene	2.48
Formaldehyde	3.38
Styrene	737.41
Methyl Methacrylate	201.21
MDI	1.35
Glycol Ether	0.07
Total HAPs>	1551.05

*HAP emissions are restricted by NESHAP (Subparts VVVV, WWWW, MMMM and PPPP).

**Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Resin and Gelcoat Operations**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733**

Significant Source Modification No.: 001-34568-00043

Significant Permit Modification No.: 001-34578-00043

Reviewer: Brian Williams

Date: May 27, 2014

		Density (lb/gal)	Wt. % Monomer Styrene	Wt. % Monomer MMA	Styrene UEF (lbs/ton)	MMA UEF (lbs/ton)	Gallons per unit	Units per hour	Styrene Emissions (tons/yr)	MMA Emissions (tons/yr)	*VOC Emissions (tons/year)	VOC Emissions (lbs/hr)	Transfer Efficiency	PM Emissions (tons/yr)	Control Efficiency	Controlled PM Emissions (tons/yr)
Building 43-1	Resin															
	040-8080B1: CCP Sytpol Unsaturated Tooling Resin	8.75	48.41%	3.30%	121.00	60.00	0.075	850	147.81	73.30	221.11	50.48	70%	353.95	99%	3.54
	Cook Composites 945GA104 HG Retention Green Tooling	9.03	42.70%	4.98%	102.00	75.00	0.075	850	128.59	94.55	223.14	50.95	70%	395.76	99%	3.96
	Gelcoat															
	947-AJ-353: CCP Polycor Gray Gel Coat	11.27	35.91%	0.00%	356.00	0.00	0.019	850	141.90	0.00	141.90	32.40	70%	153.28	99%	1.53
951-WH-447: CCP Armorcoat Hino White Gelcoat	10.16	29.19%	9.98%	259.79	150.00	0.019	850	93.35	53.90	147.26	33.62	70%	131.15	99%	1.31	
	Total Building 43-1							289.72	148.45	370.40	84.57		549.04		5.49	
Building 43-2	Resin															
	Interplastic COR61-AA-203 Laminating Resin	10.82	31.00%	0.00%	66.34	0.00	0.058	1,250	113.97	0.00	113.97	26.02	70%	711.23	99%	7.11
	Gelcoat															
	99-RBK-165: CCP Polycor HAP37 Black Gelcoat	10.0048	36.71%	0.00%	377.00	0.00	0.021	1,250	216.83	0.00	216.83	49.51	70%	218.41	99%	2.18
Interplastic W-1231-LNHM 782435 Oxford White Low Hap GC	11.23	24.00%	5.00%	213.60	75.00	0.021	1,250	137.90	48.42	186.32	42.54	70%	275.02	99%	2.75	
	Total Building 43-2							330.80	48.42	330.80	75.53		986.25		9.86	
	Total:							620.52	196.87	701.20	160.09		1,535.29		15.35	

* VOC emissions are based on the worst case coating application

METHODOLOGY

Monomer Emission Factors based on UEF Emission Factors for Open Molding.

Pollutant Emissions (tons/yr) = Pollutant EF (lbs pollutant/ton material) * gallons material / units * units / hr * density (lbs material / gal material) * 1 ton material / 2000 lbs material * 1 ton pollutant / 2000 lbs pollutant * 8760 hrs/yr

PM Emissions (tons/yr) = Density (lbs/gal) * gal/unit * units/hr * (1 - (wt. % Styrene + wt. % MMA)) * (1-transfer efficiency) * 8760 hrs/yr * 1 ton / 2000 lbs

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Resin Transfer Molding Operation
Unit ID : RTM**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733**

Significant Source Modification No.: 001-34568-00043

Significant Permit Modification No.: 001-34578-00043

Reviewer: Brian Williams

Date: May 27, 2014

Material	Density of Resin (lb/gal)	Maximum Amount of Resin Used per Unit (gal/hr)	Weight % Monomer	Emission Factor (weight % of starting monomer emitted)	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per Year
COR44-BZ-8138	10.82	42.42	37.50%	3.00%	5.16	123.93	22.62

Worst case Emission Factors for Closed Molding are 3% Based on AP-42 4.4-2.

METHODOLOGY:

Assume all of the monomer is styrene.

Potential VOC Pounds per Hour = Density of Resin(lb/gal)*Maximum Amount of Resin Used per hour (gal/hr)*Weight % of Monomer*Emission factor (weight

Potential VOC Pounds per Day = Potential VOC Pounds per Hour * (24 hrs / 1 day)

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

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
Surface Coating Operation**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC pounds/ hour	PTE VOC pound/ day	PTE VOC tons per year	Pounds solids per gallon of coating	PM PTE (ton/yr)	Transfer Efficiency	Control Efficiency	Controlled PM PTE (tons/yr)
43-1												
<i>SB1</i>												
Black	12.4	0.552	3.16	3.16	1.75	41.92	7.65	9.26	5.60	75%	95%	0.28
GEMS Gray	14.3	0.552	2.84	2.84	1.57	37.64	6.87	11.41	6.90	75%	95%	0.34
GEHC Gray	12.6	0.552	3.86	3.86	2.13	51.13	9.33	8.74	5.28	75%	95%	0.26
Steel Blue	12.1	0.552	3.79	3.79	2.09	50.26	9.17	8.32	5.03	75%	95%	0.25
<i>P1</i>												
Black	12.4	0.552	3.16	3.16	1.75	41.92	7.65	9.26	5.60	75%	95%	0.28
GEMS Gray	14.3	0.552	2.84	2.84	1.57	37.64	6.87	11.41	6.90	75%	95%	0.34
GEHC Gray	12.6	0.55	3.86	3.86	2.13	51.13	9.33	8.74	5.28	75%	95%	0.26
Steel Blue	12.11	0.55	3.79	3.79	2.09	50.26	9.17	8.32	5.03	75%	95%	0.25
43-2												
<i>PS (2 Prime Booths)</i>												
Dupont Primer	10.00	17.500	4.82	4.82	84.41	2,025.87	369.72	5.18	99.28	75%	95%	4.96
Akzo Topcoat	12.2	17.500	3.00	2.41	42.17	1,011.96	184.68	9.24	177.14	75%	95%	8.86
Akzo Primer	8.73	17.500	4.78	4.78	83.64	2,007.39	366.35	3.96	75.79	75%	95%	3.79
<i>PB-1</i>												
Dupont Primer	10.00	8.750	4.82	4.82	42.21	1,012.94	184.86	5.17	49.55	75%	95%	2.48
Akzo Topcoat	12.2	8.750	3.00	2.41	21.08	505.98	92.34	9.24	88.57	75%	95%	4.43
Akzo Primer	8.73	8.750	4.78	4.78	41.82	1,003.69	183.17	3.96	37.90	75%	95%	189%
Totals							573.25	41.32	279.51			13.98

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (gal/hr) * (lbs solids/gal) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
HAP Emissions
Surface Coating Operation**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733

Significant Source Modification No.: 001-34568-00043

Significant Permit Modification No.: 001-34578-00043

Reviewer: Brian Williams

Date: May 27, 2014

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	*Pounds Ethylbenzene per gallon of coating	*Pounds Xylene per gallon of coating	*Pounds Cumene per gallon of coating	*Pounds Toluene per gallon of coating	*Pounds MIBK per gallon of coating	*Pounds Naphthalene per gallon of coating	*Pounds of Formaldehyde per gallon of coating	*Pounds of Hexamethylene-1,6-diisocyanate per gallon of coating
43-1 (SB1)										
<i>SB1</i>										
Black	12.4	0.552	0.07	0.46	0.00	0.30	0.16	0.00	0.00	0.00
GEMS Gray	14.3	0.552	0.08	0.37	0.00	0.14	0.17	0.00	0.00	0.00
GEHC Gray	12.6	0.552	0.09	0.48	0.00	0.12	0.17	0.00	0.00	0.00
Steel Blue	12.1	0.552	0.09	0.47	0.00	0.12	0.17	0.00	0.00	0.00
<i>P1</i>										
Black	12.4	0.552	0.07	0.46	0.00	0.30	0.16	0.00	0.00	0.00
GEMS Gray	14.3	0.552	0.08	0.37	0.00	0.14	0.17	0.00	0.00	0.00
GEHC Gray	12.6	0.552	0.09	0.48	0.00	0.12	0.17	0.00	0.00	0.00
Steel Blue	12.1	0.552	0.09	0.47	0.00	0.12	0.17	0.00	0.00	0.00
43-2										
<i>PS</i>										
Dupont Primer	10.00	17.500	0.04	0.14	0.00	0.00	0.14	0.02	0.00	0.00
Akzo Topcoat	12.2	17.500	0.05	0.28	2.69	0.01	0.00	0.00	0.00	0.01
Akzo Primer	8.73	17.500	0.36	1.46	0.00	1.46	0.00	0.00	0.03	0.00
<i>PB-1 (currently idle)</i>										
Dupont Primer	10.00	8.750	0.04	0.14	0.00	0.00	0.14	0.02	0.00	0.00
Akzo Topcoat	12.2	8.750	0.05	0.31	0.02	0.01	0.00	0.00	0.00	0.01
Akzo Primer	8.73	8.750	0.36	1.46	0.00	1.46	0.00	0.00	0.03	0.00

*The table represent the HAP contents "As Applied" coatings

**Appendix A: Emissions Calculations
HAP Emissions
Surface Coating Operation**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733**

Significant Source Modification No.: 001-34568-00043

Significant Permit Modification No.: 001-34578-00043

Reviewer: Brian Williams

Date: May 27, 2014

Material	PTE Ethylbenzene (tons/yr)	PTE Xylene (tons/yr)	PTE Cumene (tons/yr)	PTE Toluene (tons/yr)	PTE MIBK (tons/yr)	PTE Naphthalene (tons/yr)	PTE Formaldehyde (tons/yr)	PTE Hexamethylene-1,6-diisocyanate (tons/yr)	PTE Total HAPs (tons/yr)
43-1 (SB1)									
<i>SB1</i>									
Black	0.18	1.10	0.00	0.73	0.38	0.00	0.00	0.00	2.39
GEMS Gray	0.20	0.90	0.00	0.33	0.40	0.00	0.00	0.00	1.83
GEHC Gray	0.22	1.15	0.00	0.29	0.40	0.00	0.00	0.00	2.07
Steel Blue	0.21	1.13	0.00	0.28	0.40	0.00	0.00	0.00	2.03
									2.39
<i>P1</i>									
Black	0.18	1.10	0.00	0.73	0.38	0.00	0.00	0.00	2.39
GEMS Gray	0.20	0.90	0.00	0.33	0.40	0.00	0.00	0.00	1.83
GEHC Gray	0.22	1.15	0.00	0.29	0.40	0.00	0.00	0.00	2.07
Steel Blue	0.21	1.13	0.00	0.28	0.40	0.00	0.00	0.00	2.03
									2.39
43-2									
<i>PS</i>									
Dupont Primer	2.75	11.01	0.00	0.00	11.01	1.65	0.00	0.00	26.42
Akzo Topcoat	3.67	21.45	206.01	0.44	0.00	0.00	0.00	0.01	231.59
Akzo Primer	27.91	111.66	0.00	111.66	0.00	0.00	2.25	0.00	253.49
									253.49
<i>PB-1 (currently idle)</i>									
Dupont Primer	1.38	5.50	0.00	0.00	5.50	0.83	0.00	0.00	13.21
Akzo Topcoat	1.83	11.74	0.84	0.22	0.00	0.00	0.00	0.01	14.65
Akzo Primer	13.96	55.83	0.00	55.83	0.00	0.00	1.13	0.00	126.74
									126.74
Total	42.3	169.8	206.9	168.9	17.3	2.5	3.4	0.03	385.0

METHODOLOGY

Pounds of HAP per Gallon Coating = (Density (lb/gal) * Weight % HAP)

Potential HAP Tons per Year = Pounds of HAP per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

Appendix A: Emissions Calculations**Particulate Emissions
Dust Booths****Company Name: Goldshield Fiberglass, Inc.****Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733****Significant Source Modification No.: 001-34568-00043****Significant Permit Modification No.: 001-34578-00043****Reviewer: Brian Williams****Date: May 27, 2014**

Stack ID	PM Concentration (lb/sdscf)	Flow Rate (dscfm)	Control Efficiency (%)	PTE PM before controls (lbs/hr)	PTE PM before controls (tons/yr)	PTE PM after controls (lbs/hr)	PTE PM after controls (tons/yr)
D-1-1	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
D-1-2	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
D-2-1	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
D-2-2	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
D-2-3	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
D-2-4	6.15E-07	21,200	98.00%	39.11	171.32	0.78	3.43
Total:				234.68	1027.92	4.69	20.56

METHODOLOGY

PM Concentration based on stack test conducted on May 21, 1997, witnessed and approved by IDEM.

PTE PM before controls (lb/hr) = PM concentration (lbs/dscf) * Flow rate (dscfm) * 60 min / hr / (1-control efficiency)

PTE PM before controls (tons/yr) = PTE PM before controls (lbs/hr) * 8760 hr/yr * 1 ton /2000 lbs

PTE PM after controls (lb/hr) = PM concentration (lbs/dscf) * Flow rate (dscfm) * 60 min / hr

PTE PM after controls (tons/yr) = PTE PM after controls (lbs/hr) * 8760 hr/yr * 1 ton /2000 lbs

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
Filament Winding process (FWP)**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733**

Significant Source Modification No.: 001-34568-00043

Significant Permit Modification No.: 001-34578-00043

Reviewer: Brian Williams

Date: May 27, 2014

Filament Winding Process (FWP)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Usage (gal/unit)	Maximum Production (unit/hour)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene Only (lb/ton)*	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	**Transfer Efficiency
Small Mandrel	10.82	32.50%	2.74	2.25	120	120	3.99	95.74	17.47	17.47	17.47	0.00	100%
Large Mandrel	10.82	32.50%	4.11	2.25	120	120	5.98	143.60	26.21	26.21	26.21	0.00	100%
Potential Emissions							5.98	143.60	26.21	26.21	26.21	0.00	

Revise emissions factors from UEF for open molding composites, dated July 23, 2001.

*Includes styrene and alpha methyl styrene as VOC. VOC emission factor computed as: 0.184 x Weight % VOC x 2,000 (lb/ton). Styrene emission factor computed as: 0.184 x Weight % Styrene x 2,000 (lb/ton).

**Filament Winding Process

METHODOLOGY

Emission factors from Unified Emission Factors for Opening Molding of Composites, July 23, 2001

Mandrel usage is mutually exclusive

Potential VOC (lb/hr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * VOC Emission Factor (lb/ton)

Potential VOC (lbs/day) = Potential VOC (lb/hr) * 24 hr/day

Potential VOC (tons/yr) = Potential VOC (lb/hr) * 8,760 hr/yr ÷ 2,000 lb/ton

Potential Particulate (tons/yr) = Maximum Production (unit/hour) * Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % VOC) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton

Potential Styrene (tons/yr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Styrene Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
Foam Spraying Process-F-1**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patterson Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC-HAP lb/ hr	PTE VOC-HAP lbs/day	PTE VOC-HAP tons/year	PTE PM (ton/yr)	PTE PM (lb/hr)	lb VOC/gal solids	*Transfer Efficiency
Foam Spraying F-1																	
Part A Foam	10.00	8.00%	0.00%	8.00%	0.00%	92.38%	0.22	1.75	0.80	0.80	0.3080	7.392	1.349	0.00	0.00	0.87	100%

PM Control Efficiency: 0.00%

Emissions are updated based on the density and the usage during this renewal.
 There is no change in the process throughput.

Totals:	Uncontrolled	0.31	7.39	1.35	0.00	0.00
	Controlled	0.31	7.39	1.35	0.00	0.00

METHODOLOGY

*Transfer Efficiency - 100% as Flow Coat Application

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Note: The above calculations are from permit renewal No. T 001-32298-00043, issued on March 8, 2013.

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
Surface Coating Operation (PC2-UP) - Alternative Operating Scenario for PC2**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Pounds solids per gallon of coating	Particulate Potential (ton/yr)	Transfer Efficiency	Control Efficiency	Controlled Particulate Emissions (tons/yr)
43-1												
PC2												
681P34238 Primer	11.38	0.46875	3.50	3.50	1.64	39.38	7.19	7.88	4.04	75%	95%	0.20
194S Activator	8.98	0.15625	2.20	2.20	0.34	8.25	1.51	6.78	1.16	75%	95%	0.06
Acetone (Cleanup)	6.67	0.25000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	75%	95%	0.00
Totals							8.69		5.20			0.26

METHODOLOGY

Coating Applied Using HVLP Spray Application
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (gal/hr) * (lbs solids/gal) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC and Particulate Emissions
Surface Coating Operation (PC2-UP) - Alternative Operating Scenario for PC2

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Pounds Ethylbenzene per gallon of coating	Pounds Glycol Ether per gallon of coating	Pounds Toluene per gallon of coating	Pounds Xylene per gallon of coating	Pounds of Hexamethylene-1,6-diisocyanate per gallon of coating
43-1							
<i>PC2</i>							
681P34238 Primer	11.38	0.46875	0.03	0.34	0.11	0.11	0.00
194S Activator	8.98	0.15625	0.00	0.00	0.00	0.00	0.02
Acetone (Cleanup)	6.67	0.25	0.00	0.00	0.00	0.00	0.00

Material	PTE Ethylbenzene (tons/yr)	PTE Glycol Ether (tons/yr)	PTE Toluene (tons/yr)	PTE Xylene (tons/yr)	PTE Hexamethylene-1,6-diisocyanate (tons/yr)	PTE Total HAPs (tons/yr)
43-1						
<i>PC2</i>						
681P34238 Primer	0.07	0.70	0.23	0.23	0.00	1.24
194S Activator	0.00	0.00	0.00	0.00	0.01	0.01
Acetone (Cleanup)	0.00	0.00	0.00	0.00	0.00	0.00

Total	0.07	0.70	0.23	0.23	0.01	1.25
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METHODOLOGY

Pounds of HAP per Gallon Coating = (Density (lb/gal) * Weight % HAP)

Potential HAP Tons per Year = Pounds of HAP per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
PC2 Gel Coat Booth
Resin and Gelcoat Operations**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014**

PC2 Reinforced Plastic Composites Operations

Unit ID	Material Description	Density (lb/gal)	Wt. % Monomer Styrene	Wt. % Monomer MMA	Styrene UEF (lbs/ton)	MMA UEF (lbs/ton)	Gallons per unit	Units per hour	Styrene Emissions (tons/yr)	MMA Emissions (tons/yr)	VOC Emissions (tons/year)	VOC Emissions (lbs/hr)	Transfer Efficiency	PM Emissions (tons/yr)	Control Efficiency	Controlled PM Emissions (tons/yr)
Building 43-1 PC2	Resin															
	040-8080B1: CCP Sytpol Unsaturated Tooling Resin	8.75	48.41%	3.30%	121.00	60.00	0.075	100	17.39	8.62	26.01	5.94	70%	41.64	95%	2.08
	Cook Composites 945GA104 HG Retention Green Tooling	9.03	42.70%	4.98%	102.00	75.00	0.075	100	15.13	11.12	26.25	5.99	70%	46.56	95%	2.33
	Gelcoat															
	947-AJ-353: CCP Polycor Gray Gel Coat	11.27	35.91%	0.00%	356.00	0.00	0.019	100	16.69	0.00	16.69	3.81	70%	18.03	95%	0.90
	951-WH-447: CCP Armorcoat Hino White Gelcoat	10.16	29.19%	9.98%	259.79	150.00	0.019	100	10.98	6.34	17.32	3.96	70%	15.43	95%	0.77
Total PC2								Total:	34.08	17.47	43.58	9.95		64.59		3.23

PC2 Reinforced Plastic Composites Operations - Gelcoat Application Only

Building 43-1 PC2 GELCOAT ONLY	Gelcoat															
	947-AJ-353: CCP Polycor Gray Gel Coat	11.27	35.91%	0.00%	356.00	0.00	0.019	100	16.69	0.00	16.69	3.81	70%	18.03	95%	0.90
	951-WH-447: CCP Armorcoat Hino White Gelcoat	10.16	29.19%	9.98%	259.79	150.00	0.019	100	10.98	6.34	17.32	3.96	70%	15.43	95%	0.77
	Total:							Total:	16.69	6.34	17.32	3.96		18.03		0.90

Note: The above calculation is to compare between the PTE emissions of PC2 and PC2-UP. (The emissions are part of existing emissions, therefore they will not be added to this modification.)

**Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes**

Company Name: Goldshield Fiberglass, Inc
Address, City, IN, Zip: 1903 Patterson Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46731
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Mold Prep Operations (P1MP)														
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Potential MMA tons per year	Potential Styrene tons per year	Potential HAP tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Sealer GP	7.28	100.00%	0.125	0.50	0.00023	2,000.00	0.46	10.92	1.99	0.00	0.00	0.00	0.00	100%
Emission Unit Subtotal							0.46	10.92	1.99	0.00	0.00	0.00	0.00	

Gel Coat Application (P1GB3)														
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Potential MMA tons per year	Potential Styrene tons per year	Potential HAP tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
963XK161 Clear Gel Coat	8.81	43.03%	5.00	0.50	0.01101	467.00	5.14	123.43	22.53	4.34	18.19	22.53	13.74	75%
Cadox L-50A MEKP	8.34	2.00%	0.10	0.50	0.00021	40.00	0.008	0.20	0.04	0.00	0.00	0.00	0.45	75%
Emission Unit Subtotal							5.15	123.63	22.57	4.34	18.19	22.53	14.19	

*Open Molding, Atomized Mechanical Gelcoat Application, Emission Factor = Styrene Content + Methyl Methacrylate Content = (377) + (90) = 467 lb/ton Gelcoat Processed

Mechanical Resin Application (P1RA)														
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Potential MMA tons per year	Potential Styrene tons per year	Potential HAP tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Hetron CR/FR 620 T-20 Resin	8.99	40.00%	19.50	0.50	0.04383	93.00	4.08	97.82	17.86	0.00	17.86	17.86	0.00	100%
Cadox L-50A MEKP	8.34	2.00%	0.32	0.50	0.00067	40.00	0.03	0.64	0.12	0.00	0.00	0.00	0.00	100%
Emission Unit Subtotal							4.10	98.46	17.98	0.00	17.86	17.86	0.00	

*Open Molding, Non-Atomized Mechanical Application - Emission Factor = Styrene Content Emission Factor = 93.0 lb/ton

Manual Resin/Hand Layup Application (P1HL)														
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Potential MMA tons per year	Potential Styrene tons per year	Potential HAP tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Hetron CR/FR 620 T-20 Resin	8.99	40.00%	11.50	0.50	0.02585	123.00	3.18	76.30	13.93	0.00	13.93	13.93	0.00	100%
CORVE8115 Vinyl Ester Resin	9.34	47.90%	10.50	0.50	0.02452	168.40	4.13	99.09	18.09	0.00	18.09	18.09	0.00	100%
Cadox L-50A MEKP	8.34	2.00%	0.36	0.50	0.00075	40.00	0.030	0.73	0.14	0.00	0.00	0.00	0.00	100%
Emission Unit Subtotal							7.34	176.12	32.16	0.00	32.02	32.02	0.00	

*Open Molding - Manual Resin Application

Uncontrolled Potential Emissions							17.05	409.13	74.70	4.34	68.07	72.41	14.19	
Enforceable PSD Minor Limitation for VOC									46.59%	0.00%	47.76%	44.90%	0.00%	
Dry Filter Control Efficiency for Compliance with PSD and 326 IAC 6-3-2									0.00%	0.00%	0.00%	0.00%	95.00%	
Controlled Total Potential Emissions									39.90	4.34	35.56	39.90	0.71	

METHODOLOGY

Tons Processed (tons/hr) = (Density (lb/gal) x Gallons/Unit x Units/Hour) / 2,000 Lb/Ton
 Potential VOC/HAP Emissions (lb/hr) = Tons Process (ton/hr) x CFA Emission Factor (lb/ton)
 Potential VOC/HAP Emissions (lb/day) = Potential Emissions (lb/hr) x 24 (hr/day)
 Potential VOC/HAP Emissions (tons/yr) = (Potential Emissions (lb/hr) x 8,760 (hr/yr)) / 2,000 (lb/ton)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Emission Factors: Unified Emission Factors for Open Molding of Composites

**Appendix A: MACT Subpart WWWW
Demonstration of Compliance Determination**

Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patterson Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014

Material Name/Code Number	Material Classification	Weight Percent Styrene	Weight Percent Methyl Methacrylate	Weight Percent HAP	Weight Percent Non-HAP Monomers	Subpart WWWW Emission Limitation lb Emitted/Ton Throughput (a)	As Applied Emission Factor lb Emitted/Ton Throughput (Below)	Compliant Material (True/False)
Mechanical Atomized Gelcoat Application								
Sealer GP	Clear Gel Coat	37.02%	6.01%	43.03%	0.00%	522	502	TRUE
Mechanical Non-Atomized Corrosion Resistant Production Resin Application								
Cadox L-50A MEKP	Production Resin - CR	40.00%	0.00%	40.00%	0.00%	113	93	TRUE
Manual Corrosion Resistant Resin Application								
Cadox L-50A MEKP	Production Resin - CR	40.00%	0.00%	40.00%	0.00%	123	123	TRUE
Emission Unit Subtotal	Production Resin - CR	47.90%	0.00%	47.90%	0.00%	123	168	FALSE

NCR = Non Corrosion Resistant
CR = Corrosion Resistant

(a) - 40 CFR 63, Subpart WWWW, Table 3 Limits

40 CFR 63, Subpart WWWW, Table 1 Formulas and Calculations:

Gelcoat Application

Clear Gel Coat - Atomized Mechanical Application

$$((1.03646 \times \%HAP) - 0.195) \times 2,000$$
 Weight % HAP = 43.03% = 502

Spray Resin Application

Production Resin - Non-Atomized Application - Corrosion Resistant

$$((0.157 \times \%HAP) - 0.0165) \times 2,000$$
 Weight % HAP = 40.00% = 93

Manual Resin Application - Corrosion Resistant Application

Production Resin - Manual Application - Corrosion Resistant

$$((0.286 \times \%HAP) - 0.0529) \times 2,000$$
 Cadox L-50A MEKP Weight % HAP = 40.00% = 123
 Emission Unit Subtotal Weight % HAP = 47.90% = 168

Determination:

Compliance will be achieved using a sourcewide weighted average emission limit as described in 40 CFR 63.5810(c)

**Appendix A: Emissions Calculations
Particulate Emissions
Scuff Sanding Operations (P1SS)**

**Company Name: Goldshield Fiberglass, Inc.
Address, City, IN, Zip: 1903 Patteron Street, 2004 Patterson Street, and
2709 Patterson Street, Decatur, Indiana 46733
Significant Source Modification No.: 001-34568-00043
Significant Permit Modification No.: 001-34578-00043
Reviewer: Brian Williams
Date: May 27, 2014**

Hand Held Sanders							
0.500	Units/Hr	x	180.00	Ft ² /Unit	=	90.00	Ft ² /Hr
90.00	Ft ² /Hr	x	0.100	in/Ft ²	(Scuff Depth, inches)	=	9.00 in ³ Dust/Hr
9.00	in ³ Dust/Hr	x	0.10	lb/in ³	=	0.90	lb loss/hr

Potential Emissions (tons/year) = Loss (lb/hr) x 8,760 (hrs/year) x 1/2,000 (lbs/ton) = 3.94 tons/year

Allowable Emission Rate lb/hr (AER) = 4.1 * Process Weight Rate (tons)^{0.67}

AER (lb/hr) = 4.1 x 0.24 = 0.99 lb/hr

Controls not required for compliance with 326 IAC 6-3-2

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion - Airmake up units and space heaters

Company Name: Goldshield Fiberglass, Inc.
 Address, City, IN, Zip: 1903 Patterson Street, 2004 Patterson Street, and
 2709 Patterson Street, Decatur, Indiana 46733
 Significant Source Modification No.: 001-34568-00043
 Significant Permit Modification No.: 001-34578-00043
 Reviewer: Brian Williams
 Date: May 27, 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	MMBtu/hr
64.59	1020	554.7	60.4 4.15 64.59

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.53	2.11	2.11	0.17	27.74	1.53	23.30

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.824E-04	3.328E-04	2.080E-02	4.992E-01	9.430E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.387E-04	3.051E-04	3.883E-04	1.054E-04	5.824E-04

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	33,283	6.38E-01	6.10E-01
Summed Potential Emissions in tons/yr	33,284		
CO2e Total in tons/yr	33,481		

Total HAPs =	0.52
Single HAP =	0.499 Hexane

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low NOx burner is 0.64.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Jeff Newport
Goldshield Fiberglass, Inc.
2004 Patterson Street
Decatur, IN 46733

DATE: August 20, 2014

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

SUBJECT: Final Decision
Significant Source Modification
001-34568-00043

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Kevin Parks – D & B Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 20, 2014

TO: Decatur Public Library

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

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

Applicant Name: Goldshield Fiberglass, Inc.
Permit Number: 001-34568-00043

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 8/20/2014 Goldshield Fiberglass, Inc. 001-34568-00043 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		Jeff Newport Goldshield Fiberglass, Inc. 2004 Patterson St Decatur IN 46733 (Source CAATS) via confirmed delivery										
2		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local Official)										
3		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 (Health Department)										
4		Decatur Public Library 128 S 3rd St Decatur IN 46733-1691 (Library)										
5		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		Decatur City Council and Mayors Office 225 W. Monroe St. Decatur IN 46733 (Local Official)										
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5			