



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: October 23, 2014

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

Source Name: Maax US Corporation

Permit Level: Title V - Minor Source Modification

Permit Number: 099 - 34835 - 00022

Source Location: 1001 North Oak Road, Plymouth, Indiana

Type of Action Taken: Revisions to permit requirements

Notice of Decision: Approval - Effective Immediately

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

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34835.

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

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

Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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



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Michael R. Pence
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Commissioner

Mr. Ron Mitchell
Maax US Corporation
1001 North Oak Road
Plymouth, Indiana 46563

October 23, 2014

Re: 099-34835-00022
Minor Source Modification

Dear Mr. Mitchell,

Maax US Corporation was issued Part 70 Operating Permit Renewal No. T099-33537-00022 on May 20, 2014 for a stationary fiber reinforced plastic composite tank & tubing manufacturing operation, located at 1001 North Oak Road, Plymouth, Indiana 46563. An application requesting changes to this permit was received on August 18, 2014 to permit units that have been constructed and operated prior to receipt of the proper permit. Pursuant to the provisions of 326 IAC 2-7-10.5, a Minor Source Modification is hereby approved to satisfy the requirements of the construction permit rules as described in the attached Technical Support Document.

The following are the affected emission units:

- (a) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.
- (b) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.
- (c) One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A, and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour. Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with a dust collector, EU-27DF, for particulate control and exhausts to stack 14.

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.



A State that Works

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

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

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

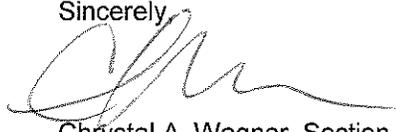
Pursuant to 326 IAC 2-7-12, operation of the new emission units is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 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 Aida DeGuzman of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Aida DeGuzman or extension 3-4972 or dial (317) 233-4972.

Sincerely,



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

Attachments: Minor/Significant Source Modification and Technical Support Document

cc: File - Marshall County
Marshall County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Commissioner

**Minor Source Modification
OFFICE OF AIR QUALITY**

**Maax US Corporation
1001 North Oak Road
Plymouth, Indiana 46563**

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

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Minor Source Modification No.: T099-34835-00022	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 23, 2014

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Part 70 Usage Report
Quarterly Report
Quarterly Deviation and Compliance Monitoring Report
Attachment A – 40 CFR 63, NESHAP, 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 stationary fiberglass bath unit and shower manufacturing plant.

Source Address:	1001 North Oak Road, Plymouth, Indiana 46563
General Source Phone Number:	(574) 936-3838
SIC Code:	3088 (Plastics Plumbing Fixtures)
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) tooling gel gun identified as EU-1, constructed in 1972, utilizing HVLP application method, with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filters for particulate overspray control and exhausting through stack #1.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (b) One (1) tooling resin gun identified as EU-2, constructed in 1976, with a maximum capacity of 420 pounds of resin per hour, equipped with dry filters for particulate overspray control and exhausting to stacks #2 and #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (c) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-4 through EU-7) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate overspray control and exhausting to stacks #1 through #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (d) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-8 through EU-11) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate overspray control and exhausting to stacks #4 through #6.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (e) One (1) gel coat booth, constructed in 1972, identified as EU-12, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #7.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (f) One (1) gel coat booth, constructed in 1972, identified as EU-13, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #8.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (g) One (1) gel coat booth, constructed in 1972, identified as EU-14, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #9.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (h) One (1) gel coat booth, constructed in 1972, identified as EU-15, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #10.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (i) One (1) grinding operation area, identified as Grinding Booth #1, consisting of six (6) grinders, identified as EU-16 through EU-21, constructed in 1972, with a combined maximum capacity of 3,250 pounds per hour, equipped with two (2) dust collectors, identified as DC-1A for EU-16 through EU-18, exhausting through stack #11A, and DC-1B for EU-19 through EU-21, exhausting through stack #11B, and one (1) air wall collector for all six (6) grinders exhausting back into the booth, for particulate control.

- (j) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.

- (k) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.

- (l) One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour. Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with dry filters EU-27DF, for particulate control and exhausts to stack 14.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

The source consists of the following insignificant activities:

- (a) One (1) grinding operation area, identified as Grinding Booth #2, constructed in 2013, with a combined maximum capacity of 625 pounds of reinforced plastic composite per hour, equipped with a portable dust collector, identified as DC-2, exhausting to stack #12, and consisting of the following:
 - (1) One (1) stationary cutting saw, identified as EU-22;
 - (2) Two (2) handheld cutting saws, identified as EU-23 and EU-24; and
 - (3) Two (2) handheld grinders, identified as EU-25 and EU-26.
- (b) Three (3) horizontal polyester resin storage tanks, each with capacity 6,000 gallons.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T099-33537-00022, 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 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

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

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

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

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T099-33537-00022 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(42). 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 5
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(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][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.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

- (l) 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8]

- (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.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(14)]:

- (a) One (1) tooling gel gun identified as EU-1, constructed in 1972, utilizing HVLP application method, with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filters for particulate overspray control and exhausting through stack #1.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (b) One (1) tooling resin gun identified as EU-2, constructed in 1976, with a maximum capacity of 420 pounds of resin per hour, equipped with dry filters for particulate overspray control and exhausting to stacks #2 and #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (c) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-4 through EU-7) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate overspray control and exhausting to stacks #1 through #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (d) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-8 through EU-11) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate overspray control and exhausting to stacks #4 through #6.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (e) One (1) gel coat booth, constructed in 1972, identified as EU-12, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #7.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (f) One (1) gel coat booth, constructed in 1972, identified as EU-13, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #8.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (g) One (1) gel coat booth, constructed in 1972, identified as EU-14, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #9.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (h) One (1) gel coat booth, constructed in 1972, identified as EU-15, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per

hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #10.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (i) One (1) grinding operation area, identified as Grinding Booth #1, consisting of six (6) grinders, identified as EU-16 through EU-21, constructed in 1972, with a combined maximum capacity of 3,250 pounds per hour, equipped with two (2) dust collectors, identified as DC-1A for EU-16 through EU-18, exhausting through stack #11A, and DC-1B for EU-19 through EU-21, exhausting through stack #11B, and one (1) air wall collector for all six (6) grinders exhausting back into the booth, for particulate control.
- (j) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.
- (k) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.
- (l) One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A, and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour, Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with dry filters EU-27DF, for particulate control and exhausts to stack 14.

Insignificant activities:

- (a) One (1) grinding operation area, identified as Grinding Booth #2, constructed in 2013, with a combined maximum capacity of 625 pounds of reinforced plastic composite per hour, equipped with a portable dust collector, identified as DC-2, exhausting to stack #12, and consisting of the following:
 - (1) One (1) stationary cutting saw, identified as EU-22;
 - (2) Two (2) handheld cutting saws, identified as EU-23 and EU-24; and
 - (3) Two (2) handheld grinders, identified as EU-25 and EU-26.

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

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

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

In order to render 326 IAC 2-2 not applicable, the total VOC emissions (due to resin and gel coat usage, mixing, blending, and mold maintenance and final finish operations) from the emission units listed below shall not exceed 249 tons per year for each twelve (12) consecutive month period with compliance determined at the end of each month:

- (a) Tooling gel gun (EU-1)
- (b) Tooling resin gun (EU-2)
- (c) Resin Chop/Lamination Booth, consisting of chop guns (EU-4 through EU-7)
- (d) Resin Chop/Lamination Booth, consisting of chop guns (EU-8 through EU-11)
- (e) Gel Coat Booths (EU-12 through EU-15)

- (f) Sheer mix tanks (SM1 and SM2)
- (g) Blend tanks (BT1 through BT4)

Compliance with this limit in conjunction with VOC emissions from the natural gas combustion at the source shall limit the source wide emissions of VOC to less than two hundred fifty (250) tons per year, rendering 326 IAC 2-2 not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the facilities listed below shall be limited as specified when operating at the respective process weight rate:

Emission Unit ID	Process Weight Rate (lb/hr)	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
Tooling gel gun (EU-1)	210	0.105	0.91
Tooling resin gun (EU-2)	420	0.21	1.44
Chop Gun (EU-4)	420	0.21	1.44
Chop Gun (EU-5)	420	0.21	1.44
Chop Gun (EU-6)	420	0.21	1.44
Chop Gun (EU-7)	420	0.21	1.44
Chop Gun (EU-8)	420	0.21	1.44
Chop Gun (EU-9)	420	0.21	1.44
Chop Gun (EU-10)	420	0.21	1.44
Chop Gun (EU-11)	420	0.21	1.44
Gel Coat Booth (EU-12)	210	0.105	0.91
Gel Coat Booth (EU-13)	210	0.105	0.91
Gel Coat Booth (EU-14)	210	0.105	0.91
Gel Coat Booth (EU-15)	210	0.105	0.91

- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from Grinding Booth #1 (consisting of six (6) grinders EU-16 through EU-21) shall not exceed 5.67 pounds per hour, when operating at a process weight rate of 3,250 pounds per hour (1.625 tons per hour).
- (c) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from Grinding Booth #2 (consisting of machining operations EU-22 through EU-26) shall not exceed 1.88 pounds per hour, when operating at a process weight rate of 625 pounds per hour (0.3125 tons per hour).
- (d) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the Sheer Mix Tanks, identified as SM1 and SM2, shall each not exceed 1.44 pounds per hour, when each tank is operating at a process weight rate of 420 pounds per hour (0.21 tons/hour).
- (e) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the Tooling Shop Grinding Booth, identified as EU-27, consisting of Hand Grinders EU-27A and EU-27B, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour.

The above limits are 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:

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

P = process weight rate in tons per hour

D.1.3 Reinforced Plastic Composites Manufacturing [326 IAC 20-56-2]

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

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel 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.1.4 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

In order to comply with Condition D.1.1, the VOC emissions shall be determined as follows:

$$E = \left[\sum_{i=1}^{i=n} ((A_i \times B_i) \div 2000) \times (UEF_i \div 2000) \right] + D + M + N$$

where:

- E = VOC emissions (tons/month)
- n = number of gel coat and resins used during the month
- A_i = density (lb/gal resin or gel coat)
- B_i = gallons of resin/gel coat used per month
- UEF_i = Unified Emission Factors for Open Molding of Composites (July 23, 2001) or its updates provided by the Composites Fabricators Association (lb monomer/ton resin or gel coat)
- i = type of resin or gel coat
- 2000 = conversion factor (lbs/ton)
- D = VOC input due to mold maintenance (tons/month)
- M = VOC emissions from Sheer Mix Tanks, SM1 & SM2
= Throughput, tons/yr x VOC weight % x Ef, 0.50% x weight % resin in mix (1- weight % filler)
- N = VOC emissions from Blend Tanks, BT1 through BT4
= Throughput, tons/yr x VOC weight % x Ef, 0.25% x weight % resin in mix (1- weight % filler)

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. For the purposes of these emissions calculations, monomer in resins and gel coats that is not styrene shall be considered styrene on an equivalent weight basis.

D.1.6 Particulate Control

- (a) In order to comply with Condition D.1.2(a) and to render 326 IAC 2-2 not applicable, the dry particulate filters for the emission units listed in the Condition D.1.2(a) shall be in operation and control emissions at all times these emission units are in operation and the Permittee shall operate the dry particulate filters in accordance with manufacturer's specifications.
- (b) In order to comply with Condition D.1.2(b) and to render 326 IAC 2-2 not applicable, the dust collector equipped on grinders (EU-16 through EU-21) shall be in operation and control emissions at all times when one or more of the associated grinder to this dust collector is in operation.
- (c) In order to comply with Condition D.1.2(e), the dust collectors and dry filters, DC-3 and EU-27DF, shall be in operation at all times the two (2) hand grinders, identified as EU-27A and EU-27B, at Tooling Shop Grinding Booth EU-27, are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] [40 CFR 64]

D.1.7 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the dry particulate filters, weekly observations shall be made of the overspray from the stacks of the

following while one or more of the associated emission units to these stacks is in operation:

- (i) One (1) tooling gel gun (stack #1)
- (ii) One tooling resin gun (stacks #2 and #3)
- (iii) Two (2) resin chop/lamination booths with eight (8) chop guns (stacks #1, #2, #3, #4, #5, and #6)
- (iv) Four (4) gel coat booths (stacks #7, #8, #9, and #10)

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) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps 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.

The above monitoring conditions are also required under 40 CFR 64 Compliance Assurance Monitoring (CAM) for the following emissions units (for PM, PM10 and PM2.5):

- (i) Tooling gel gun (EU-1)
- (ii) Tooling resin gun (EU-2)
- (iii) Resin Chop/Lamination Booths, consisting of chop guns (EU-4 through EU-11)
- (iv) Gel Coat Booths (EU-12 through EU-15)

D.1.8 Broken or Failed Bag Detection

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

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

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the stack #11 and stack #12 exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
 - (1) The usage by weight and monomer content of each resin and gel coat used and the usage by weight of each VOC containing material (except Acetone) used for mold maintenance and final finish operations. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and VOC content of each resin, gel coat and VOC containing material (except Acetone) used for mold maintenance and final finish operations;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The amount of filler mixed into each sheer mix tanks, SM1 and SM2, as a percentage to the total throughput mixture;
 - (5) The VOC emitted for each month; and
 - (6) The VOC emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain the following training records:
 - (1) A copy of the current training program; and
 - (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.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its record when a reading is not taken and the reason for the lack of observations (i.e., the process did not operate that day).
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of visible emission notations of the stack #11 and stack #12. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the boiler did not operate that day).
- (e) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 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 period 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 E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(14)]:

- (a) One (1) tooling gel gun identified as EU-1, constructed in 1972, utilizing HVLP application method, with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filters for particulate overspray control and exhausting through stack #1.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (b) One (1) tooling resin gun identified as EU-2, constructed in 1976, with a maximum capacity of 420 pounds of resin per hour, equipped with dry filters for particulate overspray control and exhausting to stacks #2 and #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered an existing affected facility.

- (c) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-4 through EU-7) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate overspray control and exhausting to stacks #1 through #3.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (d) One (1) resin chop/lamination booth, constructed in 1972, utilizing four (4) non-atomized chop guns (identified as EU-8 through EU-11) or four (4) manual application, with a maximum capacity of 420 pounds per hour of resin for each application, equipped with dry filter for particulate oversprays control and exhausting to stacks #4 through #6.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (e) One (1) gel coat booth, constructed in 1972, identified as EU-12, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #7.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (f) One (1) gel coat booth, constructed in 1972, identified as EU-13, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #8.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (g) One (1) gel coat booth, constructed in 1972, identified as EU-14, consisting of one (1) air assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #9.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

- (h) One (1) gel coat booth, constructed in 1972, identified as EU-15, consisting of one (1) air

assisted airless spray gun and one (1) Fluid Impingement Technology (FIT) gun (only one type of gun can be used at a given time), each gun with a maximum capacity of 210 pounds per hour of gel coat, equipped with dry filter for particulate overspray control and exhausting to stack, identified as stack #10.

- (j) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.
- (k) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

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

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

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

E.1.2 Reinforced Plastics Composites Production NESHAP [326 IAC 20-56] [40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW which is incorporated by reference as 326 IAC 20-56, as follows. The full text of Subpart WWWW may be found in Attachment A to this permit.

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5799
- (8) 40 CFR 63.5800
- (9) 40 CFR 63.5805(b)
- (10) 40 CFR 63.5805(g)
- (11) 40 CFR 63.5810(a)-(d)
- (12) 40 CFR 63.5835(a)
- (13) 40 CFR 63.5835(c)
- (14) 40 CFR 63.5860(a)
- (15) 40 CFR 63.5900(a)(2) - (4)
- (16) 40 CFR 63.5900(b)
- (17) 40 CFR 63.5900(c)
- (18) 40 CFR 63.5905
- (19) 40 CFR 63.5910(a)
- (20) 40 CFR 63.5910(b)
- (21) 40 CFR 63.5910(c)(1) -(3), (5)
- (22) 40 CFR 63.5910(d)
- (23) 40 CFR 63.5910(f)
- (24) 40 CFR 63.5910(g)-(i)
- (25) 40 CFR 63.5915(a)(1),(2)
- (26) 40 CFR 63.5915(c)
- (27) 40 CFR 63.5915(d)

- (28) 40 CFR 63.5920
- (29) 40 CFR 63.5925
- (30) 40 CFR 63.5930
- (31) 40 CFR 63.5935
- (32) Tables 3, 4, 7, 8, 9, 13, 14, and 15

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

Source Name: Maax US Corporation
Source Address: 1001 North Oak Road, Plymouth, Indiana 46563
Part 70 Permit No.: T099-33537-00022

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: Maax US Corporation
Source Address: 1001 North Oak Road, Plymouth, Indiana 46563
Part 70 Permit No.: T099-33537-00022

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report**

Source Name: Maax US Corporation
Source Address: 1001 North Oak Road, Plymouth, Indiana 46563
Part 70 Permit No.: T099-33537-00022
Facility: Tooling gel gun (EU-1), Tooling resin gun (EU-2), Resin Chop/Lamination Booths, consisting of chop guns (EU-4 through EU-11) and Gel Coat Booths (EU-12 through EU-15)
Parameter: VOC Emissions
Limit: the total VOC emissions (due to resin and gel coat usage, mixing, blending and mold maintenance and final finish operations) from the emission units listed above shall not exceed 249 tons per year for each twelve (12) consecutive month period with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions Current Month (tons)	VOC Emissions Previous 11 Months (tons)	VOC Emissions 12 Consecutive Month Total (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Source Name: Maax US Corporation
Source Address: 1001 North Oak Road, Plymouth, Indiana 46563
Part 70 Permit No.: T099-33537-00022

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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Description and Location

Source Name:	Maax US Corporation
Source Location:	1001 North Oak Road, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3088 (Plastics Plumbing Fixtures)
Operation Permit No.:	T099-33537-00022
Operation Permit Issuance Date:	May 20, 2014
Minor Source Modification No.:	099-34835-00022
Significant Permit Modification No.:	099-34911-00022
Permit Reviewer:	Aida DeGuzman

Existing Approvals

The source was issued Part 70 Operating Permit No. T099-33537-00022 on May 20, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Marshall County.

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

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Marshall County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air

pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, 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**
 Marshall County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	175.54
PM ₁₀	175.64
PM _{2.5}	175.64
SO ₂	0.01
NO _x	1.80
VOC	249.00
CO	1.51
GHGs as CO ₂ e	2,177.41
HAPs	
Styrene	249.00

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) These emissions are based upon the information in the Technical Support Document of the TV Renewal T099-33537-00022, issued on May 20, 2014.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP (Styrene) emissions are greater than ten (10) tons per year for a single HAP. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Maax US Corporation on August 18, 2014 based upon Compliance and Enforcement Branch inspection requiring the permitting of the following existing unpermitted emission units. The following is a list of the emission units and pollution control devices:

- (a) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.
- (b) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.
- (c) One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour. Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with a dust collector, EU-27DF, for particulate control and exhausts to stack 14.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

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.”

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	18.95
PM ₁₀	18.95
PM _{2.5}	18.95
SO ₂	--
VOC	4.48
CO	--
NO _x	--
Single HAPs (Styrene)	4.48

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.

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

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(A), because the potential to emit is greater than 5 tons/year but less than 25 tons per year of PM, PM10 or PM2.5. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification involves a Title I change. This is a Title I change because the source wide VOC emission limit will be adjusted to accommodate the emissions from the unpermitted emission units.

Permit Level Determination – PSD

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

Potential to Emit of Modification (tons/yr)											
Process	Emission Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	single HAP (styrene)	Total HAPs
Sheer Mix Tanks	SM1, SM2	9.48	9.48	9.48	-	-	2.98	-	-	2.98	2.98
Blend Tanks	BT1, BT2, BT3, BT4						1.48	-	-	1.48	1.48
Tooling Shop Grinding Booth	EU-27A & EU-27B	0.22	0.22	0.22	-	-	-	-	-	-	-
TOTAL PTE		9.70	9.70	9.70	0.00	0.00	4.48	0.00	0.00	4.48	4.48
PSD Major Source Threshold		250	250	250	250	250	250	250	100,000 CO_{2e}	-	-
Potential to Emit After Modification (tons/yr)											
Process	Emission Unit ID	PM	PM10	PM2.5	SO2	NOx	**VOC	CO	GHGs	***single HAP (styrene)	***Total HAPs
Sourcewide Existing Emission Units Limited PTE		175.54	175.64	175.64	0.01	1.80	249	1.51	2,177.41	249	249
Sheer Mix Tanks	SM1, SM2	9.48	9.48	9.48	-	-	2.99	--	--	2.98	2.98
Blend Tanks	BT1, BT2, BT3, BT4	--	--	--	--	--	1.48	--	--	1.48	1.48
Tooling Shop Grinding Booth	EU-27A & EU-27B	0.22	0.22	0.22	--	--	--	--	--	--	--
TOTAL PTE AFTER ISSUANCE OF MODIFICATION		185.24	185.24	185.24	0.01	1.80	249	1.51	2,177.41	249	249
PSD Major Source Threshold		250	250	250	250	250	250	250	100,000 CO_{2e}	--	--

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

**The source modification will be operated under the existing permitted VOC limits. No increase in the allowable VOC emissions is requested in association with the source modification.

*** VOC is limited to 249 tons/yr source wide, but, since styrene is also a VOC, total styrene is equivalent to 249 tons/yr.

- (a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds. Note: the source modification's PTE will be combined into the existing limit of 249 tons per year; no increase in the VOC limit is requested. Therefore, the source will stay an existing minor source under 326 IAC 2-2 (PSD rules).

The existing emission units at the source are currently limited to 249 tons per twelve consecutive month period. The PTE of the unpermitted emission units will be combined into the 249 ton per year limit: The PSD limit is the following:

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

In order to render 326 IAC 2-2 not applicable, the total VOC emissions (due to resin and gel coat usage and mold maintenance and final finish operations) from the emission units listed below shall not exceed 249 tons per year for each twelve (12) consecutive month period with compliance determined at the end of each month:

- (a) Tooling gel gun (EU-1)
- (b) Tooling resin gun (EU-2)
- (c) Resin Chop/Lamination Booth, consisting of chop guns (EU-4 through EU-7)
- (d) Resin Chop/Lamination Booth, consisting of chop guns (EU-8 through EU-11)
- (e) Gel Coat Booths (EU-12 through EU-15)
- (f) Sheer Mix Tanks (SM1, SM2)**
- (g) Blend Tanks (BT1 through BT4)**

Compliance with this limit in conjunction with VOC emissions from the natural gas combustion at the source shall limit ~~will limit~~ the source wide emissions of VOC to less than two hundred fifty (250) tons per year, rendering 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

NSPS:

- (a) 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984)

This rule applies to storage vessels with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

The sheer mix tanks (SM1, SM2) and blend tanks (BT1 through BT4) are not subject to this Subpart Kb because they do not meet the definition of a storage vessel in §60.111b of this Subpart Kb because they are process tanks. The definition of storage vessel excludes process tanks.

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

NESHAP

- (c) 40 CFR Part 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

This rule was already determined to be applicable to existing emission units engage in the production of reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The units subject includes cleaning , mixing, HAP containing material storage and repair operations associated with te production of plastic composites. The existing unpermitted emission units that are subject to this subpart WWWW are the following:

- (1) Sheer Mix Tanks (SM1, SM2)
- (2) Blend Tanks (BT1 through BT4)

Nonapplicable portions of the NESHAP will not be included in the permit. The following sections of 40 CFR Part 63, Subpart WWWW will be applicable to the above fiberglass facilities:

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

The Permittee has chosen to comply with the requirements by using the emission rate without add-on control devices; therefore, testing requirements under this NESHAP have not been included in the permit for this source.

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

CAM

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

The 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:

Particulate (PM/PM10/PM2.5) 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)
Sheer Mix Tank, SM1	None	Y	9.48	9.48	100	N	--
Sheer Mix Tank, SM2	None	Y	9.48	9.48	100	N	--
Hand Grinder (sawing)	Dust Collector	Y	3.69	0.18	100	N	--
Hand Grinder (smoothing)	Dust Collector	Y	0.69	0.03	100	N	--

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to the Sheer Mix tanks, identified as SM1 and SM2 and Hand Grinder, identified as EU-27A and EU27B for PM/PM10/PM2.5).

VOC/Single HAP (styrene) 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)
Sheer Mix Tank, SM1	None	Y	1.49	1.49	100	N	--
Sheer Mix Tank, SM2	None	Y	1.49	1.49	100	N	--
Blend Tanks, BT1-BT4	None	Y	0.37 each	0.37 each	100	N	--

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to Sheer Mix Tanks, SM1 and SM2, and to each Blend Tank, BT1 through BT4, for VOC and single HAP.

State Rule Applicability Determination

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))

326 IAC 2-4.1(b)(2) specifically exempts sources regulated by a standard under Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA). The source is regulated by NESHAP 40 CFR 63, Subpart WWWW. Therefore, these facilities are exempt from the requirements of 326 IAC 2-4.1.

- (a) Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.
- (b) Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.

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

This rule applies to new facilities constructed as of January 1, 1980 that:

- (a) have potential emissions of twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or more per year;
- (b) are located anywhere in the state; and
- (c) are not otherwise regulated by:
 - (1) other provisions of this article;
 - (2) 326 IAC 20-48; or
 - (3) 326 IAC 20-56;

New facilities shall reduce VOC emissions using best available control technology (BACT).

The following emission units are not subject to 326 IAC 8-1-6 because each unit emits VOC less than 25 tons per year and they are subject to 326 IAC 20-56:

- (a) Two (2) sheer mix tanks, identified as SM1 and SM2.
- (b) Four (4) blend tanks, identified as BT1 through BT4.

326 IAC 20-56 (Reinforced Plastic Composites Production)

This rule applies to the following emission units because they are subject to 40 CFR Part 63, Subpart WWWW:

- (a) Two (2) sheer mix tanks, identified as SM1 and SM2.
- (b) Four (4) blend tanks, identified as BT1 through BT4.

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

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

- (2) To ensure training goals listed in paragraph (b) below 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 paragraph (a)(1), if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:
- (1) A copy of the current training program.
 - (2) A list of the following:
 - (A) All current personnel, by name, that are required to be trained.
 - (B) The date the person was trained or date of most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Tooling Shop Grinding Booth, identified as EU-27, consisting of Hand Grinders EU-27A and EU-27B, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Sheer Mix Tanks (SM1, and SM2) shall each not exceed 1.44 pounds per hour when each tank is operating at a process weight rate of 0.21 tons per hour.
- (c) The pound per hour PM limitations in (a) and (b) were calculated with the following equation:

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

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

The dust collectors DC-3 and EU-27DF shall be in operation at all times the two (2) hand grinders, identified as EU-27A and EU-27B at Tooling Shop Grinding Booth EU-27, are in operation, in order to comply with this 326 IAC 6-3.

The Sheer Mix Tanks, SM1 and SM2, can comply with the 326 IAC 6-3 rule without control.

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.

The compliance monitoring requirements are not necessary to this modification except the operation of the control devices as follows:

- (a) The dust collectors DC-3 and EU-27DF, associated with the two Hand Grinders EU-27A and EU-27B at the Tooling Shop Grinding Booth identified as EU-27, shall be in operation at all times these grinders are in operation.

The operation of the control equipment for the grinders is necessary to comply with 326 IAC 6-3.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 099-33537-00022 to incorporate Minor Source Modification 099-34835-00022. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Section A.2 Changes:

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

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

- (j) **Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.**
- (k) **Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.**
- (l) **One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A, and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour. Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with a dust collector, EU-27DF, for particulate control and exhausts to stack 14.**

Section D.1 Changes:

Emissions Unit Description [326 IAC 2-7-5(14)]:

- (j) **Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.**
- (k) **Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.**
- (l) **One (1) tooling shop grinding booth, identified as EU-27, with two (2) hand grinders, identified as EU-27A and EU-27B, permitted in 2014, with a combined maximum capacity of 500 pounds per hour. Grinder EU-27A is equipped with a dust collector, DC-3, for particulate control and exhausts to stack 13. Grinder EU-27B is equipped with a dust collector, EU-27DF, for particulate control and exhausts to stack 14.**

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

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

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

In order to render 326 IAC 2-2 not applicable, the total VOC emissions (due to resin and gel coat usage, **mixing, blending**, and mold maintenance and final finish operations) from the emission units listed below shall not exceed 249 tons per year for each twelve (12) consecutive month period with compliance determined at the end of each month:

- (a) Tooling gel gun (EU-1)
- (b) Tooling resin gun (EU-2)
- (c) Resin Chop/Lamination Booth, consisting of chop guns (EU-4 through EU-7)
- (d) Resin Chop/Lamination Booth, consisting of chop guns (EU-8 through EU-11)
- (e) Gel Coat Booths (EU-12 through EU-15)
- (f) Sheer mix tanks (SM1 and SM2)**
- (g) Blend tanks (BT1 through BT4)**

Compliance with this limit in conjunction with VOC emissions from the natural gas combustion at the source shall limit ~~will limit~~ the source wide emissions of VOC to less than two hundred fifty (250) tons per year, rendering 326 IAC 2-2 not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the facilities listed below shall be limited as specified when operating at the respective process weight rate:

Emission Unit ID	Process Weight Rate (lb/hr)	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
Tooling gel gun (EU-1)	210	0.105	0.91
Tooling resin gun (EU-2)	420	0.21	1.44
Chop Gun (EU-4)	420	0.21	1.44
Chop Gun (EU-5)	420	0.21	1.44
Chop Gun (EU-6)	420	0.21	1.44
Chop Gun (EU-7)	420	0.21	1.44
Chop Gun (EU-8)	420	0.21	1.44
Chop Gun (EU-9)	420	0.21	1.44
Chop Gun (EU-10)	420	0.21	1.44
Chop Gun (EU-11)	420	0.21	1.44
Gel Coat Booth (EU-12)	210	0.105	0.91
Gel Coat Booth (EU-13)	210	0.105	0.91
Gel Coat Booth (EU-14)	210	0.105	0.91
Gel Coat Booth (EU-15)	210	0.105	0.91

- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions ~~rate~~ from Grinding Booth #1 (consisting of six (6) grinders EU-16 through EU-21) shall not exceed 5.67 pounds per hour, when operating at a process weight rate of 3,250 pounds per hour (1.625 tons per hour).
- (c) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions ~~rate~~ from Grinding Booth #2 (consisting of machining operations EU-22 through EU-26) shall not exceed 1.88 pounds per hour, when operating at a process weight rate of 625 pounds per hour (0.3125 tons per hour).
- (d) **Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the Sheer Mix Tanks, identified as SM1 and SM2, shall each not exceed 1.44 pounds per hour, when each tank is operating at a process weight rate of 420 pounds per hour (0.21 tons/hour).**
- (e) **Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the Tooling Shop Grinding Booth, identified as EU-27, consisting of Hand Grinders EU-27A and EU-27B, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour.**

The above limits are 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:

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

$$P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

In order to comply with Condition D.1.1, the VOC emissions shall be determined as follows:

$$E = \left[\sum_{i=1}^{i=n} ((A_i \times B_i) \div 2000) \times (UEF_i \div 2000) \right] + D + M + N$$

where:

- E = VOC emissions (tons/month)
n = number of gel coat and resins used during the month
A_i = density (lb/gal resin or gel coat)
B_i = gallons of resin/gel coat used per month
UEF_i = Unified Emission Factors for Open Molding of Composites (July 23, 2001) or its updates provided by the Composites Fabricators Association (lb monomer/ton resin or gel coat)
i = type of resin or gel coat
2000 = conversion factor (lbs/ton)
D = VOC input due to mold maintenance (tons/month)
M = VOC emissions from Sheer Mix Tanks, SM1 & SM2
= Throughput, tons/yr x VOC weight % x Ef, 0.50% x weight % resin in mix (1-weight % filler)
N = VOC emissions from Blend Tanks, BT1 through BT4
= Throughput, tons/yr x VOC weight % x Ef, 0.25% x weight % resin in mix (1-weight % filler)

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. For the purposes of these emissions calculations, monomer in resins and gel coats that is not styrene shall be considered styrene on an equivalent weight basis.

D.1.6 Particulate Control

- (a) In order to comply with Condition D.1.2(a) and to render 326 IAC 2-2 not applicable, the dry particulate filters for the emission units listed in the Condition D.1.2(a) shall be in operation and control emissions at all times these emission units are in operation and the Permittee shall operate the dry particulate filters in accordance with manufacturer's specifications.
- (b) In order to comply with Condition D.1.2(b) and to render 326 IAC 2-2 not applicable, the dust collector equipped on grinders (EU-16 through EU-21) shall be in operation and control emissions at all times when one or more of the associated grinder to this dust collector is in operation.
- (c) In order to comply with Condition D.1.2(e), the dust collectors, DC-3 and EU-27DF, shall be in operation at all times the two (2) hand grinders, identified as EU-27A, and EU-27B at Tooling Shop Grinding Booth EU-27, are in operation.**

The following Condition D.1.8 has been deleted from the Part 70 permit because the dust collector DC-2 controlling insignificant activities in this condition does not require parametric monitoring. This dust collector is portable and is similar to a shop-vac and has no pressure gauge.

D.1.8 Parametric Monitoring

~~The Permittee shall record the pressure drop across the dust collector used in conjunction with the six (6) grinders (EU-16 through EU-21) and dust collector (DC-2) used in conjunction with the cutting saws (EU-22 through EU-24) and handheld grinders (EU-25 and EU-26), at least once per day when one or more of the associated emission unit to these controls is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1 and 6 inches of water or a range established during the latest stack test, the Permittee shall take a~~

~~reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.~~

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

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

D.1.14 10Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the records in accordance with (1) through ~~(5)~~ **(6)** below. Records maintained for (1) through ~~(5)~~ **(6)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
- (1) The usage by weight and monomer content of each resin and gel coat used and the usage by weight of each VOC containing material (except Acetone) used for mold maintenance and final finish operations. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer’s certified product data sheets, and calculations necessary to verify the type, amount used, and VOC content of each resin, gel coat and VOC containing material (except Acetone) used for mold maintenance and final finish operations;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The amount of filler mixed into each sheer mix tanks, SM1 and SM2, as a percentage to the total throughput mixture;**
 - ~~(4-5)~~ The VOC emitted for each month; and
 - ~~(56)~~ The VOC emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain the following training records:
- (1) A copy of the current training program; and
 - (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.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its record when a reading is not taken and the reason for the lack of observations (i.e., the process did not operate that day).
- ~~(d) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the dust collector controlling the Six (6) grinders (EU-16 through EU-21) and dust collector (DC-2) controlling the cutting saws (EU-22 through EU-24) and handheld grinders (EU-25 and EU-26). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).~~

- (e d) To document the compliance status with Condition D.1.40 **9**, the Permittee shall maintain daily records of visible emission notations of the stack #11 and stack #12. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the boiler did not operate that day).
- (fe) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 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 period 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(~~34~~**35**).

Section E.1 Changes:

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(14)]:

- (j) **Two (2) sheer mix tanks, identified as SM1 and SM2, permitted in 2014, each with a maximum capacity of 1,840 tons per year of mixed resin and filler, with no controls.**
- (k) **Four (4) blend tanks, identified as BT1 through BT4, permitted in 2014, each with a maximum capacity of 920 tons per year of resin, with no controls.**

Under 40 CFR Part 63, Subpart WWWW, this facility is considered existing affected facility.

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

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) **40 CFR 63.5790**
- (4) 40 CFR 63.5795**
- (~~35~~) 40 CFR 63.5796
- (~~4-6~~) 40 CFR 63.5797
- (7) 40 CFR 63.5799**
- (~~5-8~~) 40 CFR 63.5800
- (~~6-9~~) 40 CFR 63.5805(b)
- (~~7-10~~) 40 CFR 63.5805(g)
- (~~8-11~~) 40 CFR 63.5810(a)-(d)
- (~~9-12~~) 40 CFR 63.5835(a)
- (~~10-13~~) 40 CFR 63.5835(c)
- (~~14-14~~) 40 CFR 63.5860(a)
- (~~12-15~~) 40 CFR 63.5900(a)(2) - (4)
- (~~13-16~~) 40 CFR 63.5900(b)
- (~~14-17~~) 40 CFR 63.5900(c)
- (~~15-18~~) 40 CFR 63.5905
- (~~16-19~~) 40 CFR 63.5910(a)

- (~~17~~20) 40 CFR 63.5910(b)
- (~~18~~21) 40 CFR 63.5910(c)(1) -(3), (5)
- (~~19~~22) 40 CFR 63.5910(d)
- (~~20~~23) 40 CFR 63.5910(f)
- (~~21~~24) 40 CFR 63.5910(g)-(i)
- (~~22~~25) 40 CFR 63.5915(a)(1),(2)
- (~~23~~26) 40 CFR 63.5915(c)
- (~~24~~27) 40 CFR 63.5915(d)
- (~~25~~28) 40 CFR 63.5920
- (~~26~~29) 40 CFR 63.5925
- (~~27~~30) 40 CFR 63.5930
- (~~28~~31) 40 CFR 63.5935
- (~~29~~32) Tables 3, 4, 7, 8, 9, 13, 14, and 15

Conclusion and Recommendation

The proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 099-34835-00022 and Significant Permit Modification No. 099-34911-00022. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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
Source Summary**

Company Name: Maax US Corporation
Address City IN Zip: 1001 North Oak Road, Plymouth, Indiana 46563
SPM No.: 099-34911-00022
MSM No.: 099-34835-00022
Reviewer: Aida DeGuzman
Date: October 23, 2014

Uncontrolled PTE (tons/yr)

Process	Emission Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	single HAP (styrene)	Total HAPs
Sheer Mix Tanks	SM1, SM2	9.48	9.48	9.48	-	-	2.99	-	-	2.99	2.99
Blend Tanks	BT1, BT2, BT3, BT4	0.00	0.00	0.00	-	-	1.49	-	-	1.49	1.49
Tooling Shop Grinding Booth	EU-27A & EU-27B	4.38	4.38	4.38	-	-	-	-	-	-	-
TOTAL Uncontrolled PTE		13.86	13.86	13.86	0.00	0.00	4.48	0.00	0.00	4.48	4.48

Limited/Controlled PTE (tons/yr)

Process	Emission Unit ID	PM	PM10	PM2.5	SO2	NOx	*VOC	CO	GHGs	single HAP (styrene)	Total HAPs
Sheer Mix Tanks	SM1, SM2	9.48	9.48	9.48	-	-	2.99	-	-	2.99	2.99
Blend Tanks	BT1, BT2, BT3, BT4						1.49	-	-	1.49	1.49
Tooling Shop Grinding Booth	EU-27A & EU-27B	0.22	0.22	0.22	-	-	-	-	-	-	-
TOTAL Limited/Controlled PTE		9.70	9.70	9.70	0.00	0.00	4.48	0.00	0.00	4.48	4.48

*The source wide VOC emissions limit of 249 tons/year will be adjusted to accommodate the 4.48 tons of VOC/year emissions from these unpermitted emission units, and keep the source minor for PSD.

Appendix A: Emission Calculations

Company Name: Maax US Corporation
Address City IN Zip: 1001 North Oak Road, Plymouth, Indiana 46563
SPM No.: 099-34911-00022
MSM No.: 099-34835-00022
Reviewer: Aida DeGuzman
Date: October 23, 2014

Tooling Shop Grinding Booth with Two (2) Hand Grinders (EU-27A & EU-27B)						Uncontrolled PTE of PM			Controlled PTE of PM		
Description	Emission Unit ID	Control Device ID	Stack ID	Amount of dust collected (lb/hr)	PM control efficiency	lb/hr	lb/day	ton/yr	lb/hr	lb/day	ton/yr
One (1) Hand Grinder (Sawing)	EU-27A	DC-3	#13	0.80	95.00%	0.84	20.21	3.69	0.04	1.01	0.18
One (1) Hand Grinder (Smoothing)	EU-27B	EU-27DF	#14	0.15	95.00%	0.16	3.79	0.69	0.01	0.19	0.03
Totals				0.95		1.00	24.00	4.38	0.05	1.20	0.22

Methodology:

$PM=PM_{10}=PM_{2.5}$

Uncontrolled PTE of PM (lb/hr) = Amount of dust collected (lb/hr) / PM control efficiency

Uncontrolled PTE of PM (lb/day) = Uncontrolled PTE of PM (lb/hr) * 24 hrs/day

Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) * 8760 hr/yr * 1 ton/2000 lb

Controlled PTE of PM = Uncontrolled PTE of PM * (1 - PM control efficiency)

EU-27A consists of a hand grinder used for sawing operations equipped with localized pickup directed to a bag filter collector

EU-27B consists of a hand grinder used for smoothing part edges and ventilates through a wall mounted exhaust fan using dry filters for particulate control

Allowable Emission Rate (AER) Calculation

Allowable Emission (lb/hr) = $4.10 \times [\text{Process Weight Rate}]^{0.67} =$

Material Input Rate (lb/hr) =

Allowable Emission (tons/yr) =

EU-27

1.62

500.0

7.09

This emission unit does not require controls for compliance with 326 IAC 6-3-2 limits.

Appendix A: Emission Calculations

Company Name: Maax US Corporation
Address City IN Zip: 1001 North Oak Road, Plymouth, Indiana 46563
SPM No.: 099-34911-00022
MSM No.: 099-34835-00022
Reviewer: Aida DeGuzman
Date: October 23, 2014

Resin Sheer Mix Tanks and Blend Storage Tanks

Operation/Material	Unit ID/Control Device	Weight % Volatile (water & organics)	Volume % Water	Weight % Organics	Filler/Powder Loading % Added to Unit	Maximum Throughput (tons/year)	HAP/VOC (Styrene) Emission Factor from EPA 40 CFR Part 63, Subpart WWWW Tech. Background Information Document	HAP/VOC (Styrene) PTE (tons/year)	PM/PM10/PM2.5E mission Factor *%	Uncontrolled PM/PM10/PM2.5 PTE (tons/yr)	Uncontrolled PM/PM10/PM2.5 PTE (lb/hr)	Maximum Throughput (tons/hr)	326 IAC 6-3 Allowable (lb/hr)
Sheer Mix Tank (SM1)	Covered Mixing Operation	33.5%	0.0%	33.5%	51.5%	1840	0.50%	1.49	0.50%	4.74	1.08	0.21	1.44
Sheer Mix Tank (SM2)	Covered Mixing Operation	33.5%	0.0%	33.5%	51.5%	1840	0.50%	1.49	0.50%	4.74	1.08	0.21	1.44
Blend Tank (BT1)	Covered Tank	33.5%	0.0%	33.5%	0.0%	920	0.25%	0.37	0.00%	0.00	0.00	0.00	0.00
Blend Tank (BT2)	Covered Tank	33.5%	0.0%	33.5%	0.0%	920	0.25%	0.37	0.00%	0.00	0.00	0.00	0.00
Blend Tank (BT3)	Covered Tank	33.5%	0.0%	33.5%	0.0%	920	0.25%	0.37	0.00%	0.00	0.00	0.00	0.00
Blend Tank (BT4)	Covered Tank	33.5%	0.0%	33.5%	0.0%	920	0.25%	0.37	0.00%	0.00	0.00	0.00	0.00
								PTE Difference		4.48		9.48	

Particulate emission factor - using AP-42 Chapter 6.4.1 for Paint Manufacturing - 0.5 percent of pigment/filler handled
VOC/HAP emission factors - using EF from the Technical Background Information Document of 40 CFR Part 63, Subpart WWWW.
Sheer Mix Tanks are open when filler and ingredients are added to the tank then mixing is performed - VOC EF is 0.50%
Blend Tanks have agitators, minimal agitation is occurring while covered - VOC EF is 0.25%
HAP is styrene
The mix tanks and blend tanks do not employ add-on control equipment.

METHODOLOGY

*Weight % Organics taken from T099-33537-00022 for PolyLite Resin
**Filler only added to Sheer Mix Tanks; No filler is added to blend tanks and therefore PM/PM10/PM2.5 loss is zero on the blend tanks
VOC/HAP Emissions, tons/yr = throughput, tons/yr * VOC weight % * Emission Factor * Weight % Resin In Mix (1 - Weight% Filler)
PM/PM10/PM2.5 Emissions, tons/yr = throughput, tons/yr * PM/PM10 Emission Factor * ton/2000 lb
PM/PM10/PM2.5 Emissions, lb/hr = PM/PM10/PM2.5 Emissions (tons/yr) * 2000 lb/ton / 8760 hrs/yr



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Ron Mitchell
Maax US Corporation
1001 N Oak Rd
Plymouth, IN 46563

DATE: October 23, 2014

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

SUBJECT: Final Decision
Title V - Minor Source Modification
099 - 34835 - 00022

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:
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